



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

NOV 18 2014

CERTIFIED MAIL – RETURN RECEIPT REQUESTED: 7001 0360 0001 1267 0297

Mr. Brien T. Conner
President
C4 Environmental Services LLC
9000 Ste A Liberty Road
Houston, Texas 77028

Re: No Further Action Concerning the Request for Information Pursuant to Section 3007 of RCRA regarding facility operations at the facility located in Houston, Texas; EPA ID No. TXR000070243

Dear Mr. Conner:

I am writing to inform you that the Compliance Assurance and Enforcement Division of Region 6 US Environmental Protection Agency has reviewed the information you provided in the response to the matter of a RCRA 3007 Information Request dated April 23, 2014. Based on the information provided, we determined no further action is required at this time.

If you have any questions regarding this letter or the 3007 file review, please contact Paul James of my enforcement staff at the above EPA address, or telephone (214) 665-6445.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Mark Potts", written over a horizontal line.

Mark Potts, Chief
Hazardous Waste Enforcement Branch



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

APR 23 2014

CERTIFIED MAIL - RETURN RECEIPT REQUESTED: 7011 3500 0000 0359 6563

Mr. Brien T. Conner
President
C4 Environmental Services LLC
9000 Ste A Liberty Road
Houston, TX 77028

Re: Request for Information Pursuant to Section 3007 of RCRA regarding operations at the facility located in Houston, Texas; EPA ID No. TXR000070243

Dear Mr. Conner:

Enclosed is an Information Request Letter ("Request") issued to C4 Environmental Services LLC, 9000 Ste A Liberty Road, Houston, Texas. This request is being made pursuant to the authority set forth in Section 3007 of the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. § 6927. Pursuant to this authority, the United States Environmental Protection Agency ("EPA"), Region 6 may require persons with information relevant to the generation, storage, treatment, transportation, disposal, and/or otherwise handling of hazardous wastes to submit information to EPA to determine compliance with RCRA 42 U.S.C. §§ 6921 - 6992k at its facility.

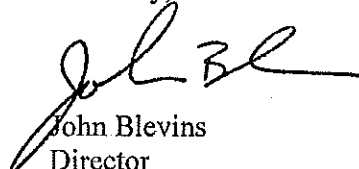
Please respond to this Request within thirty (30) calendar days of receipt of this letter. Compliance with this Request is mandatory. Failure to respond fully and truthfully to the Request or to adequately justify such failure to respond can result in enforcement action by EPA pursuant to Section 3008 of RCRA, 42 U.S.C. § 6928.

This Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. § 3501, et seq. Your response to this Request should be sent to Paul James at the United States Environmental Protection Agency, Hazardous Waste Enforcement Branch (6EN-H), 1445 Ross Avenue, Suite 1200, Dallas, Texas 75202.

RE: C4 Environmental Services LLC
Information Request

Please direct technical questions to Mr. Paul James of the Hazardous Waste Enforcement Branch at (214) 665-6445, and legal questions to Ms. Marcia Moncrieffe in the Office of Regional Counsel at (214) 665-7343. Thank you for your attention to this matter.

Sincerely,



John Blevins
Director
Compliance Assurance and
Enforcement Division

Enclosures

cc: Mr. Mark Oliver
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, TX 78711-3087

ENCLOSURE A

INFORMATION REQUEST

The Environmental Protection Agency ("EPA"), Region 6 is investigating C4 Environmental Services LLC's ("C4 Environmental") compliance with the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. §§ 6921 – 6992k, at its facility in Houston, Texas. Pursuant to Section 3007 of RCRA, 42 U.S.C. § 6927, you are hereby required to follow the instructions and provide responses to the information required by the questions in this Information Request ("Request"). You are required to submit the requested information to EPA, Region 6 within thirty (30) calendar days of receipt of this Request. If you anticipate that you will be unable to fully respond to this Request within thirty (30) calendar days, you must submit a sworn affidavit or declaration by a responsible corporate official within twenty (20) calendar days of receipt of this Request specifying what information will be provided within the specified 30 calendar day time period, describing what efforts have been/are being made to obtain other responsive information, and providing a detailed schedule of when such other responsive information can be provided. Upon receipt and based on such affidavit or declaration, EPA, Region 6 may extend the time in which C4 Environmental must provide the responsive information. Furthermore, EPA, Region 6 retains its right to obtain additional information beyond what is sought in this Request.

All information submitted in response to this Request must be certified as true, accurate, and complete by an individual with sufficient knowledge and authority to make such representations on behalf of C4 Environmental. An affidavit making such representations is provided as Enclosure B. A knowing submittal of false information in response to this Request may be actionable under 18 U.S.C. § 1001, and 42 U.S.C. § 6928(d). Furthermore, failure to fully comply with this Request may subject C4 Environmental to an enforcement action under Section 3008 of RCRA, 42 U.S.C. § 6928.

In accordance with Section 3007(b) of RCRA, 42 U.S.C. § 6927(b), the records, reports, and information requested in this Request must be submitted, whether or not you regard part or all of it as a trade secret or confidential. You may, if you desire, assert a business confidentiality claim for all or part of the information submitted in accordance with 40 C.F.R. Part 2. The information qualifying as business confidential will be disclosed by EPA only to the extent and by the procedures set forth in 40 C.F.R. Part 2, Subpart B. Unless you make a claim at the time that you submit the information, it may be made available to the public by EPA without further notice to you. If you do assert a business confidentiality claim, you must follow the procedures set forth in Section I - Instructions.

All information responsive to this Request should be sent to the following:

Mr. Paul James
Hazardous Waste Enforcement Branch (6EN-H)
Compliance Assurance and Enforcement Division
U.S. EPA - Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

I. INSTRUCTIONS

1. The enclosed Affidavit (Enclosure B) must be filled out and signed by a responsible corporate official and submitted along with your responses to this Request.
2. If information or documents not known or not available to you as of the date of submission of a response to this Request should later become known or available to you, you must supplement your response to EPA, Region 6. Moreover, should you find, at any time after the submission of your response that any portion of the submitted information is false or misrepresents the truth, you must notify EPA of this fact as soon as possible and provide EPA with a corrected response. There are significant penalties for submitting false information, including the possibility of fine or imprisonment.
3. For each document produced in response to this Request, indicate on the document, or in some other reasonable manner, the number of the Question to which it responds. Please submit all information for each question in one logically sequenced electronic format (i.e., electronic copy) and one logically sequenced bound format (i.e., paper copy).
4. If you wish to assert a claim of business confidentiality, you must clearly mark each page of each document included in your claim with a legend such as "trade secret," "proprietary," or "company confidential." If you claim information submitted in response to this Request as confidential, you must also provide a redacted version of the information with all confidential business information deleted. For any document in which you assert a claim of business confidentiality, please answer the following questions:
 - a. What specific portions of the information are alleged to be entitled to confidential treatment? Specify by page, paragraph, and sentence when identifying the information subject to your claim.
 - b. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a specified event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, specify that event. Additionally, explain why the information should be protected for the time period you've specified.
 - c. What measures have you taken to protect the information claimed as confidential from undesired disclosure? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If yes, why is the information still considered confidential?
 - d. Is the information contained in any publicly accessible forums or materials such as the Internet, databases, promotional publications, annual reports, or articles? Is

RE: C4 Environmental Services LLC
Information Request

there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?

- e. Has any governmental body made a determination as to the confidentiality of the information? If so, please attach a copy of the determination.
- f. For each category of information claimed as confidential, explain with specificity whether disclosure of the information is likely to result in substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial, and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?
- g. Is there any other explanation you deem relevant to EPA's determination of your business confidentiality claim that is not covered in the preceding questions? If so, you may provide such additional explanation.

You must furnish answers to the above questions concurrent with your response to this Request if you have claimed any information as business confidential. See 40 C.F.R. § 2.204(e)(2). Pursuant to 40 C.F.R. § 2.205(b)(2), you may request an extension of this deadline. EPA will construe your failure to furnish timely answers as a waiver of your confidentiality claim, consistent with 40 C.F.R. § 2.204(e)(1).

II. DEFINITIONS

The following definitions shall apply to the following words as they appear in Enclosure A:

1. The terms "document" and "documents" shall mean any object that records, stores, or presents information, both electronic and tangible, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations, including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, report, notice, message, analysis, comparison, graph, chart, interoffice or intra-office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any hard drive, flash drive, CD, DVD, or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such hard drive, flash drive, CD, DVD, or other type of memory and together with printouts of such hard drive, flash drive, CD, DVD, or other

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- type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document, and (e) every document referred to in any other document.
2. The term "C4 Environmental" means C4 Environmental Services LLC, including any officer, director, agent, or employee and any merged, consolidated, or acquired predecessor or parent, subsidiary, division, or affiliate thereof.
 3. The term "you" or "yours" refers to C4 Environmental.
 4. The term "facility" means C4 Environmental at 9000 Ste A Liberty Road, Houston, Texas 77028.
 5. The terms "identify" or "identification" means when used in reference to a natural person, to provide his or her name, present or last known address, present or last known employment position or affiliation, and positions or affiliations during the time period covered by this Request.
 6. All terms used in the Request will have their ordinary meaning unless such terms are defined in RCRA, 40 C.F.R. Parts 260 - 280, and the federally-authorized Texas hazardous waste program.
 7. The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Request, any information which might otherwise be construed to be outside its scope.
 8. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions.
 9. The terms "relate to" or "pertain to" (or any form thereof) shall mean constituting, reflecting, representing, supporting, contradicting, referring to, stating, describing, recording, noting, embodying, containing, mentioning, studying, analyzing, discussing, evaluating or relevant to.
 10. The term "managed" shall mean treated, stored, disposed, recycled, or reclaimed and includes the definition for "management" or "hazardous waste management" as defined at 40 C.F.R. § 260.10.

III. INFORMATION REQUESTED

1. Identify the person(s) answering these questions on behalf of C4 Environmental located in Houston, TX ("Facility").

RE: C4 Environmental Services LLC
Information Request

2. Provide the following information about C4 Environmental:
 - a. Respondent's legal name, address, and current owner.
 - b. Provide the place and date of incorporation. Provide the date the Facility began doing business in the State of Texas.
 - c. Provide the name and address of C4 Environmental's current registered agent for service of process.
 - d. Provide the date C4 Environmental began operations at the facility.
 - e. Provide a description of C4 Environmental's industrial processes, and include your Standard Industrial Code (SIC) or North American Industry Classification System (NAICS) code.
 - f. Provide the number of C4 Environmental employees at your Houston facility.
 - g. Do you operate as a transporter of hazardous waste?
 - h. Do you operate as a generator of hazardous waste? If so, which hazardous waste classification(s) have you operated under i.e., large quantity generator, small quantity generator, conditionally exempt small quantity generator or non-generator of hazardous waste?
3. Under what generator status have you operated during the period from January 1, 2009 through December 31, 2013? Provide a copy of each Notification of Regulated Waste Activity (Form 8700-12) filed with the Texas Commission on Environmental Quality ("TCEQ") and EPA for your Facility at 9000 Ste A Liberty Road, Houston, Texas during the period of January 1, 2009 through December 31, 2013.
4. Provide a legible copy of each of your TCEQ Notification of Registration for Industrial and Hazardous Waste (document IHW020) for the Facility during the period from January 1, 2009 through December 31, 2013.
5. For questions 3 and 4 above, please explain changes in C4 Environmental's generator status during the period of January 1, 2009 through December 31, 2013, stating the exact date(s) of the change(es) and the circumstances that C4 Environmental used/or caused it to determine its change in generator status.
6. For the period from January 1, 2009 through December 31, 2013:
 - a. Provide a copy of waste handling procedure.

RE: C4 Environmental Services LLC
Information Request

- i. Do you store hazardous waste at your facility? What is the longest you have stored hazardous waste at the facility?
 - ii. Do you bulk hazardous wastes at your facility from different locations? What is the longest you have stored hazardous waste at the facility?
 - iii. Do you generate hazardous waste at your facility? What is the longest you have stored hazardous waste at the facility?
 - iv. Do you clean used drums at your facility? If so, describe the process and how you manage the waste.
 - v. Do you clean tankers at your facility? If so, describe the process and how you manage the waste.
 - vi. Do you segregate your listed hazardous waste from your characteristic hazardous waste? If so, describe the process and how you manage the different waste streams.
 - vii. Provide electronic copies of all hazardous waste manifests.
- b. Provide the following documentation regarding any hazardous waste determinations conducted on each solid waste:
 - i. Provide analytical data and/or knowledge of process documentation and/or basis used for your hazardous waste determination in accordance with 40 CFR 262.11 and 40 CFR 268.7.
 - ii. Identify the point of generation for which you conducted the hazardous waste determination (i.e., where in the process the determination sample was taken or where in the process your knowledge of process determination was made). For this response, please provide the use of a diagram in addition to a narrative.
- c. Identify and describe how each solid and/or hazardous waste is managed onsite (i.e., stored, treated, and/or recycled), including the number of days stored on site and the manner and place(s) of storage. Please support this response with current photographs (photographs taken within 7 days of C4 Environmental's receipt of this Request) of C4 Environmental's waste management areas/locations at its Houston location. These photographs should be date and time stamped.
- d. Provide copies of the waste management log showing dates of waste generation and dates of shipment for the period of January 1, 2009 through December 31, 2013.

RE: C4 Environmental Services LLC
Information Request

- e. Identify each treatment, storage, and/or disposal ("TSD") facility to which you sent waste and provide copies of the waste profile for each waste stream sent to each facility.
 - f. Provide information about the shipments of waste that have been rejected by each respective TSD facility, including a narrative of why the waste was rejected and how C4 Environmental eventually handled or managed said waste.
 - g. Provide information regarding your understanding of how the wastes listed in question 6(e) are managed at each respective TSD facility and provide the basis for this understanding
7. For the period of January 1, 2009 through December 31, 2013, provide the following information about all other companies or contractors who generated waste at your facility:
- a. The other companies' or contractors' legal names, addresses, telephone numbers, and current operators.
 - b. Provide a description of the other companies' or contractors' industrial processes, and include the Standard Industrial Code (SIC) or North American Industry Classification System (NAICS) code.
 - c. Provide information about hazardous waste other companies or contractors generated and the management method of those wastes.
8. For the period of January 1, 2009 through December 31, 2013, provide a copy of your personnel training program and revisions for handling and managing hazardous wastes during standard and emergency operations. At a minimum, include personnel names, positions, and responsibilities. Are there additional personnel who manage hazardous waste at the facility which did not receive the training? What was the date of your last of such training and please list the personnel who received the training?
9. For the period of January 1, 2009 through December 31, 2013, provide a copy of your contingency plan, emergency procedures, and revisions for emergencies, including procedures for minimizing hazards from any planned or unplanned releases of hazardous wastes from your facility. Please indicate the date these plan(s) and procedures were developed, established, and implemented.
10. For the period of January 1, 2009 through December 31, 2013, provide a copy of each operating procedure used at your facility to manage hazardous waste in containers and tanks. Please indicate the date these plan(s) and procedures were developed, established, and implemented.

RE: C4 Environmental Services LLC
Information Request

ENCLOSURE B

STATEMENT OF CERTIFICATION

C4 Environmental Services LLC – Houston, Texas

I certify that I am authorized to respond to this information request on behalf of C4 Environmental Services LLC and I certify under penalty of perjury that the foregoing is true and correct. Executed on _____, 2014.

(Signature)

(Name)

(Title)

See Reverse for Instructions



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

APR 23 2014

HZ/RC/EN/OGT
TXR000070243
File

CERTIFIED MAIL - RETURN RECEIPT REQUESTED: 7011 3500 0000 0359 6563

Mr. Brien T. Conner
President
C4 Environmental Services LLC
9000 Ste A Liberty Road
Houston, TX 77028

Re: Request for Information Pursuant to Section 3007 of RCRA regarding operations at the facility located in Houston, Texas; EPA ID No. TXR000070243

Dear Mr. Conner:

Enclosed is an Information Request Letter ("Request") issued to C4 Environmental Services LLC, 9000 Ste A Liberty Road, Houston, Texas. This request is being made pursuant to the authority set forth in Section 3007 of the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. § 6927. Pursuant to this authority, the United States Environmental Protection Agency ("EPA"), Region 6 may require persons with information relevant to the generation, storage, treatment, transportation, disposal, and/or otherwise handling of hazardous wastes to submit information to EPA to determine compliance with RCRA 42 U.S.C. §§ 6921 - 6992k at its facility.


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RE: C4 Environmental Services LLC
Information Request

Please direct technical questions to Mr. Paul James of the Hazardous Waste Enforcement Branch at (214) 665-6445, and legal questions to Ms. Marcia Moncrieffe in the Office of Regional Counsel at (214) 665-7343. Thank you for your attention to this matter.

Sincerely,



John Blevins
Director
Compliance Assurance and
Enforcement Division

Enclosures

cc: Mr. Mark Oliver
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, TX 78711-3087

ENCLOSURE A

INFORMATION REQUEST

The Environmental Protection Agency ("EPA"), Region 6 is investigating C4 Environmental Services LLC's ("C4 Environmental") compliance with the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. §§ 6921 – 6992k, at its facility in Houston, Texas. Pursuant to Section 3007 of RCRA, 42 U.S.C. § 6927, you are hereby required to follow the instructions and provide responses to the information required by the questions in this Information Request ("Request"). You are required to submit the requested information to EPA, Region 6 within thirty (30) calendar days of receipt of this Request. If you anticipate that you will be unable to fully respond to this Request within thirty (30) calendar days, you must submit a sworn affidavit or declaration by a responsible corporate official within twenty (20) calendar days of receipt of this Request specifying what information will be provided within the specified 30 calendar day time period, describing what efforts have been/are being made to obtain other responsive information, and providing a detailed schedule of when such other responsive information can be provided. Upon receipt and based on such affidavit or declaration, EPA, Region 6 may extend the time in which C4 Environmental must provide the responsive information. Furthermore, EPA, Region 6 retains its right to obtain additional information beyond what is sought in this Request.

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In accordance with Section 3007(b) of RCRA, 42 U.S.C. § 6927(b), the records, reports, and information requested in this Request must be submitted, whether or not you regard part or all of it as a trade secret or confidential. You may, if you desire, assert a business confidentiality claim for all or part of the information submitted in accordance with 40 C.F.R. Part 2. The information qualifying as business confidential will be disclosed by EPA only to the extent and by the procedures set forth in 40 C.F.R. Part 2, Subpart B. Unless you make a claim at the time that you submit the information, it may be made available to the public by EPA without further notice to you. If you do assert a business confidentiality claim, you must follow the procedures set forth in Section I - Instructions.

All information responsive to this Request should be sent to the following:

Mr. Paul James
Hazardous Waste Enforcement Branch (6EN-H)
Compliance Assurance and Enforcement Division
U.S. EPA - Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

I. INSTRUCTIONS

1. The enclosed Affidavit (Enclosure B) must be filled out and signed by a responsible corporate official and submitted along with your responses to this Request.
2. If information or documents not known or not available to you as of the date of submission of a response to this Request should later become known or available to you, you must supplement your response to EPA, Region 6. Moreover, should you find, at any time after the submission of your response that any portion of the submitted information is false or misrepresents the truth, you must notify EPA of this fact as soon as possible and provide EPA with a corrected response. There are significant penalties for submitting false information, including the possibility of fine or imprisonment.
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there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?

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1. The terms "document" and "documents" shall mean any object that records, stores, or presents information, both electronic and tangible, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations, including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, report, notice, message, analysis, comparison, graph, chart, interoffice or intra-office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any hard drive, flash drive, CD, DVD, or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such hard drive, flash drive, CD, DVD, or other type of memory and together with printouts of such hard drive, flash drive, CD, DVD, or other

RE: C4 Environmental Services LLC
Information Request

type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document, and (e) every document referred to in any other document.

2. The term "C4 Environmental" means C4 Environmental Services LLC, including any officer, director, agent, or employee and any merged, consolidated, or acquired predecessor or parent, subsidiary, division, or affiliate thereof.
3. The term "you" or "yours" refers to C4 Environmental.
4. The term "facility" means C4 Environmental at 9000 Ste A Liberty Road, Houston, Texas 77028.
5. The terms "identify" or "identification" means when used in reference to a natural person, to provide his or her name, present or last known address, present or last known employment position or affiliation, and positions or affiliations during the time period covered by this Request.
6. All terms used in the Request will have their ordinary meaning unless such terms are defined in RCRA, 40 C.F.R. Parts 260 - 280, and the federally-authorized Texas hazardous waste program.
7. The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Request, any information which might otherwise be construed to be outside its scope.
8. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions.
9. The terms "relate to" or "pertain to" (or any form thereof) shall mean constituting, reflecting, representing, supporting, contradicting, referring to, stating, describing, recording, noting, embodying, containing, mentioning, studying, analyzing, discussing, evaluating or relevant to.
10. The term "managed" shall mean treated, stored, disposed, recycled, or reclaimed and includes the definition for "management" or "hazardous waste management" as defined at 40 C.F.R. § 260.10.

III. INFORMATION REQUESTED

1. Identify the person(s) answering these questions on behalf of C4 Environmental located in Houston, TX ("Facility").

RE: C4 Environmental Services LLC
Information Request

2. Provide the following information about C4 Environmental:
 - a. Respondent's legal name, address, and current owner.
 - b. Provide the place and date of incorporation. Provide the date the Facility began doing business in the State of Texas.
 - c. Provide the name and address of C4 Environmental's current registered agent for service of process.
 - d. Provide the date C4 Environmental began operations at the facility.
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 - g. Do you operate as a transporter of hazardous waste?
 - h. Do you operate as a generator of hazardous waste? If so, which hazardous waste classification(s) have you operated under i.e., large quantity generator, small quantity generator, conditionally exempt small quantity generator or non-generator of hazardous waste?
3. Under what generator status have you operated during the period from January 1, 2009 through December 31, 2013? Provide a copy of each Notification of Regulated Waste Activity (Form 8700-12) filed with the Texas Commission on Environmental Quality ("TCEQ") and EPA for your Facility at 9000 Ste A Liberty Road, Houston, Texas during the period of January 1, 2009 through December 31, 2013.
4. Provide a legible copy of each of your TCEQ Notification of Registration for Industrial and Hazardous Waste (document IHW020) for the Facility during the period from January 1, 2009 through December 31, 2013.
5. For questions 3 and 4 above, please explain changes in C4 Environmental's generator status during the period of January 1, 2009 through December 31, 2013, stating the exact date(s) of the change(es) and the circumstances that C4 Environmental used/or caused it to determine its change in generator status.
6. For the period from January 1, 2009 through December 31, 2013:
 - a. Provide a copy of waste handling procedure.

RE: C4 Environmental Services LLC
Information Request

- i. Do you store hazardous waste at your facility? What is the longest you have stored hazardous waste at the facility?
 - ii. Do you bulk hazardous wastes at your facility from different locations? What is the longest you have stored hazardous waste at the facility?
 - iii. Do you generate hazardous waste at your facility? What is the longest you have stored hazardous waste at the facility?
 - iv. Do you clean used drums at your facility? If so, describe the process and how you manage the waste.
 - v. Do you clean tankers at your facility? If so, describe the process and how you manage the waste.
 - vi. Do you segregate your listed hazardous waste from your characteristic hazardous waste? If so, describe the process and how you manage the different waste streams.
 - vii. Provide electronic copies of all hazardous waste manifests.
- b. Provide the following documentation regarding any hazardous waste determinations conducted on each solid waste:
 - i. Provide analytical data and/or knowledge of process documentation and/or basis used for your hazardous waste determination in accordance with 40 CFR 262.11 and 40 CFR 268.7.
 - ii. Identify the point of generation for which you conducted the hazardous waste determination (i.e., where in the process the determination sample was taken or where in the process your knowledge of process determination was made). For this response, please provide the use of a diagram in addition to a narrative.
- c. Identify and describe how each solid and/or hazardous waste is managed onsite (i.e., stored, treated, and/or recycled), including the number of days stored on site and the manner and place(s) of storage. Please support this response with current photographs (photographs taken within 7 days of C4 Environmental's receipt of this Request) of C4 Environmental's waste management areas/locations at its Houston location. These photographs should be date and time stamped.
- d. Provide copies of the waste management log showing dates of waste generation and dates of shipment for the period of January 1, 2009 through December 31, 2013.

RE: C4 Environmental Services LLC
Information Request

- e. Identify each treatment, storage, and/or disposal ("TSD") facility to which you sent waste and provide copies of the waste profile for each waste stream sent to each facility.
 - f. Provide information about the shipments of waste that have been rejected by each respective TSD facility, including a narrative of why the waste was rejected and how C4 Environmental eventually handled or managed said waste.
 - g. Provide information regarding your understanding of how the wastes listed in question 6(e) are managed at each respective TSD facility and provide the basis for this understanding
7. For the period of January 1, 2009 through December 31, 2013, provide the following information about all other companies or contractors who generated waste at your facility:
- a. The other companies' or contractors' legal names, addresses, telephone numbers, and current operators.
 - b. Provide a description of the other companies' or contractors' industrial processes, and include the Standard Industrial Code (SIC) or North American Industry Classification System (NAICS) code.
 - c. Provide information about hazardous waste other companies or contractors generated and the management method of those wastes.
8. For the period of January 1, 2009 through December 31, 2013, provide a copy of your personnel training program and revisions for handling and managing hazardous wastes during standard and emergency operations. At a minimum, include personnel names, positions, and responsibilities. Are there additional personnel who manage hazardous waste at the facility which did not receive the training? What was the date of your last of such training and please list the personnel who received the training?
9. For the period of January 1, 2009 through December 31, 2013, provide a copy of your contingency plan, emergency procedures, and revisions for emergencies, including procedures for minimizing hazards from any planned or unplanned releases of hazardous wastes from your facility. Please indicate the date these plan(s) and procedures were developed, established, and implemented.
10. For the period of January 1, 2009 through December 31, 2013, provide a copy of each operating procedure used at your facility to manage hazardous waste in containers and tanks. Please indicate the date these plan(s) and procedures were developed, established, and implemented.

RE: C4 Environmental Services LLC
Information Request

ENCLOSURE B

STATEMENT OF CERTIFICATION

C4 Environmental Services LLC – Houston, Texas

I certify that I am authorized to respond to this information request on behalf of C4 Environmental Services LLC and I certify under penalty of perjury that the foregoing is true and correct. Executed on _____, 2014.

(Signature)

(Name)

(Title)

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> ■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. 		<p>A. Received by (Please Print Clearly) <i>TRAVIS E BRYAN</i> B. Date of Delivery <i>4/28/06</i></p>	
<p>1. Article Addressed to:</p> <p>Mr. Brien T. Conner President C4 Environmental Services LLC 9000 Ste A Liberty Road Houston, TX 77028</p>		<p>C. Signature <i>x Travis Bryan</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p>	
		<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If YES, enter delivery address below:</p>	
		<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail</p> <p><input type="checkbox"/> Registered <input checked="" type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>	
		<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	
<p>2. Article Number (Transfer from service label)</p>		<p>7011 3500 0000 0359 6563</p>	
PS Form 3811, March 2001		Domestic Return Receipt 102595-01-M-1424	

Routing and Concurrence Slip		Begin Routing Date: 01/12/2014
To: (Name, office symbol, route number, building, Agency/Post)	Initials	Date
1. Dale Thrush/R6/USEPA/US	DT	02/19/2014
2. Marcia Moncrieffe/R6/USEPA/US	MM	03/07/2014
3. Michael Barra/R6/USEPA/US	MB	04/02/2014
4. Troy Stuckey/R6/USEPA/US	TS	04/03/2014
5. Mark Potts/R6/USEPA/US	MP	04/07/2014
6. John Blevins/R6/USEPA/US	JB	04/18/2014
7. Rhonda Ruple/R6/USEPA/US	RR	4/22/14
8. Dale Thrush/R6/USEPA/US		
9. Alice Weinberger	AW	4/23/14
Office: Compliance Assurance and Enforcement Division		
Tracking Category: RCRA Information Request		
Enforcement Confidential: Yes		
Email Subject: C4 Environmental 3007		
Due Date:		
DD/DDD Assigned: John Blevins		
DD/DDD Status:		
DD Remarks:		
<input type="checkbox"/> As Requested <input type="checkbox"/> For Correction <input checked="" type="checkbox"/> Signature <input checked="" type="checkbox"/> DD/DDD Signature <input checked="" type="checkbox"/> Concurrence <input type="checkbox"/> Real-Time Enforcement <input type="checkbox"/> AD Signature <input type="checkbox"/> RA Signature		
Remarks:		
From: (Name, org, symbol, Agency/Post) Dale Thrush/R6/USEPA/US		Room No./Bldg: REG,06,CAED Phone Number: 214-665-9799

RECEIVED

2014 JUL -1 PM 1:57
HAZARDOUS WASTE
ENFORCEMENT BRANCH

MOLTZ | MORTON | GLENN
LLP

Steve Morton
(512) 439-2172
smorton@MMandG.com

Travis Oaks Building
5113 Southwest Parkway, Suite 120
Austin, TX 78735
(512) 439-2170
Facsimile (512) 439-2165

June 25, 2014

Mr. Paul James
Hazardous Waste Enforcement Branch (6EN-H)
Compliance Assurance and Enforcement Division
U.S. EPA - Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

Via Federal Express

RE: Response to Request for Information Pursuant to Section 3007 of RCRA regarding operations at the C4 Environmental Services, LLC facility located in Houston, Texas; EPA ID No. TXR000070243

Dear Mr. James:

C4 Environmental Services, LLC ("C4") is in receipt of EPA's Request for Information Pursuant to RCRA Section 3007 dated April 23, 2014 ("Request"). Please find enclosed C4's Response to this Request as follows:

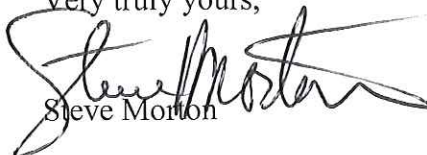
1. Written responses to questions;
2. Thumb drive containing responsive documents identified in the written response; and
3. Statement of Certification.

This Response is timely pursuant to the extension to the deadline to file until June 27, 2014, granted by EPA Region VI counsel on May 5, 2014. Finally, C4 is providing only electronic copies of responsive documents (no hard copies provided) pursuant to permission granted by Marcia Moncrieffe on June 19, 2014.

Please direct all future correspondence in this matter to me.

Thank you for your attention to this matter.

Very truly yours,


Steve Morton

SM/pjp

Enclosures

cc: Marcia Moncrieffe (w/o encls.)

{01256/1/00041340.1}

**Response to EPA Region VI RCRA 3007 (a) Information Request to
C4 Environmental Services LLC, Houston, Texas
Received on April 28, 2014**

**Extension to Response Deadline Granted by EPA Region VI Counsel
On May 5, 2014.
New Deadline is June 27, 2014.**

General Limitations and Objections

A number of questions in the Request contain terms that are undefined, overly broad or ambiguous. C4 Environmental Service LLC ("C4") has endeavored to provide responses and information in this Response that are based on its reasonable reading of the terms used in this Request. In so responding, C4 is not waiving its objections to the lack of definition, over breadth or ambiguity of the terms used in this Request.

By responding to any question, C4 does not admit or agree that EPA's characterization of activities or materials in the question are accurate.

C4 has reserved its right to withhold documents on the basis of legally recognized privileges, including the attorney-client and attorney work product privileges.

C4 has only provided information known by its own personnel, and C4 has only reviewed or provided documents located in its own files.

C4 objects to the Request to the extent that it seeks information beyond the scope of EPA's authority under Section 3007 of the Resource Conservation and Recovery Act (42 U.S.C.A. Section 6901 et seq., "RCRA"). EPA's Section 3007(a) authority extends only to information reasonably relevant to the Agency's RCRA hazardous waste enforcement and compliance powers. C4 further objects to the Request to the extent it seeks information related to events and/or activities that are beyond EPA's authority and/or jurisdiction due to the applicability of any relevant statutes of limitation. C4 particularly objects to the very broad definition of "C4 Environmental" to include all of its officers, directors, agents, and employees, and any parent, subsidiary, division, affiliate. For example, "Agents" of C4 could be very broadly construed to include the attorneys and/or consultants of C4; "Affiliates" could be very broadly construed to include entities very loosely related to C4, including in the extreme interpretation, its customers; and "employees" could be very broadly construed to include former employees over which C4 has no control. Again, C4 has only provided information known by its own personnel and documents located in its own files.

C4 construes its obligations to respond to the Request as governed by the scope of the Agency's authority pursuant to Section 3007(a), and has interpreted such requests on the premise that the Request is reasonably related to information relevant to the Agency's lawful objectives pursuant to Section 3007 (a).

C4's production of documents does not represent or act as an admission that the contents of the documents are true, correct or accurate, nor does it act to authenticate such documents for the purposes of admissibility in any administrative or judicial proceeding.

This Response does not in any way constitute a waiver of any other objections C4 may have as to the reasonableness and scope of the request.

C4 reserves the right to supplement this Response at any time.

Pursuant to permission granted by Marcia Moncrieffe on June 19, 2014, Respondent is providing only electronic copies of responsive documents.

General Information Concerning Respondent

- 1. Identify the person(s) answering these questions on behalf of C4 Environmental located in Houston, TX ("Facility").**

The responses were prepared by C4 representatives after a review of the relevant documents and discussions with available personnel. It cannot be said, therefore, that any one document or one person is responsible for a specific response. C4, has, however, made a good faith effort to fully respond to EPA's request.

With the exception of legal counsel, the following individuals were involved in the preparation of this Response:

Mr. Brien T. Conner, Manager
C4 Environmental Services LLC
9000 Liberty Road
Houston, Texas 77028

- 2. Provide the following information about C4 Environmental:**

- a. Respondent's legal name, address, and current owner.**

The Respondent is C4 Environmental Services LLC. This entity is referred to as "C4" or "Respondent." The address is 9000 Liberty Road, Houston, Texas 77028. It is a Limited Liability Company. The owners are: Brien T. Conner, Dean Artero, David Wiegel, Mark Wiegel.

- b. Provide the place and date of incorporation. Provide the date the Facility began doing business in the State of Texas.**

Incorporation papers for C4 were filed with the Secretary of State in Texas in December of 2005 and Respondent started doing business in or around May, 2006. C4 acquired MZTech, Inc d.b.a. UTS Environmental ("UTS") in August of 2010. UTS is a wholly owned subsidiary of C4. UTS provides waste transportation services.

- c. Provide the name and address of C4 Environmental's current registered agent for service of process.**

Brien Todd Conner
C4 Environmental Services LLC
9000 Liberty Road, Houston, TX 77028.

- d. Provide the date C4 Environmental began operations at the facility.**

From approximately May 2006 through April 2009 C4 leased a small office and yard space at 7200 S. Lake Houston Parkway, Houston TX. In December 2008, C4 purchased its current location at 9000 Liberty Road but didn't move in and start operations until approximately April 2009.

e. Provide a description of C4 Environmental's industrial processes, and include your Standard Industrial Code (SIC) or North American Industry Classification System (NAICS) code.

C4 Environmental Services LLC is primarily an environmental service provider to its customers. C4 has and maintains US DOT licenses to transport waste, offer vacuum truck services, roll-off services, waste brokerage services, and other industrial services such as pressure washing, sump cleaning, etc. C4 is registered as a Universal Waste Handler with the TCEQ. In approximately August 2010, C4 purchased the transportation company UTS. UTS shares the same yard as C4 and primarily handles the vacuum truck and roll-off services. C4 handles the waste brokerage, Universal Waste Handling, and small container transportation. Ownership of UTS is the same as C4. All employees belong to C4 Environmental Services. The best fit for C4's NAICS code is 562998.

f. Provide the number of C4 Environmental employees at your Houston facility.

Currently, C4 employs approximately 38 people at its Houston Facility.

g. Do you operate as a transporter of hazardous waste?

Yes. C4 Environmental Services US DOT # is 1642813 and UTS's US DOT # is 1663368. C4's EPA Hazardous Waste ID is TXR000070243. UTS's EPA ID Number is TXR000063909.

h. Do you operate as a generator of hazardous waste? If so, which hazardous waste classification(s) have you operated under i.e., large quantity generator, small quantity generator, conditionally exempt small quantity generator or non-generator of hazardous waste?

C4 does not operate as a hazardous waste generator.

C4 generates four (4) streams. Three are non-hazardous and one is a Universal Waste.

The largest volume by far is Universal Waste. C4 is a TCEQ registered Universal Waste Handler. C4 brings in Universal Waste from our customers, consolidates or repackages it as needed, and ships the Universal Waste to the final TSDF under C4 Environmental's name.

The second largest stream that C4 generates is Non-Hazardous Trailer Rinse-Out. C4 rinses out company owned vacuum trailers and vacuum trucks in between different customer loads if the prior load was non-hazardous. The cleaning and rinsate collection is done on a specially constructed lined/concrete pad and sump area so all rinsate (and rainfall that lands on the pad) are collected. Since we only handle our own trailers and from loads that are non-hazardous, the waste that is collected is classified as Non-hazardous Class I.

The third stream that C4 generates is Non-Hazardous Spill Cleanup & PPE from in-house operations.

The last stream that C4 generates is Non-Hazardous Fire Extinguisher Solids. C4 collects any Fire Extinguisher Powder from in house weak fire extinguishers or from training our employees the proper way to extinguish a fire by letting them practice using a fire extinguisher by spraying the dry contents into a drum.

3. Under what generator status have you operated during the period from January 1, 2009 through December 31, 2013? Provide a copy of each Notification of Regulated Waste Activity (Form 8700-12) filed with the Texas Commission on Environmental Quality ("TCEQ") and EPA for your Facility at 9000 Ste A Liberty Road, Houston, Texas during the period of January 1, 2009 through December 31, 2013.

During this period, C4 operated as a generator of non-hazardous industrial solid waste, including Universal Waste. C-4 never operated as a hazardous waste generator. A chronological description of changes during the requested time frame follows.

In May of 2006, C4 Environmental Services LLC began operations at 7200 S. Lake Houston Parkway, Houston, TX 77049. This facility operated as a transporter-transfer facility. This facility was not a Universal Waste Handler. (Please see: Attachment 1 - RCRA Subtitle C ID Form 05 08 2006; Attachment 2 - TCEQ Core Data Form- 7200 Lake Houston Pkwy; and Attachment 3 - TCEQ- Initial notification- 7200 Lake Houston Pkwy 05 18 2006.)

In April of 2009, C4 Environmental Services LLC moved to a new facility located at 9000 Liberty Rd. C4 Environmental Services LLC registered with the Texas Commission on Environmental Quality as a Large Quantity Handler of Universal Waste, (Universal Waste Only Generator), in addition to operating as a transporter-transfer facility. (Please see: Attachment 4 - TCEQ-EPA Notification 05 18 2009; Attachment 5 - TCEQ notification 05 18 2009; Attachment 6 - TCEQ Core Data Form Update 05 18 2009; Attachment 7 - RCRA Subtitle C ID Form 07 20 2010; and Attachments 8 and 9 - C4 NOR July 2010 & C4 NOR Sept 2010).

4. Provide a legible copy of each of your TCEQ Notification of Registration for Industrial and Hazardous Waste (document IHW020) for the Facility during the period from January 1, 2009 through December 31, 2013.

See #3 above.

5. For questions 3 and 4 above, please explain changes in C4 Environmental's generator status during the period of January 1, 2009 through December 31, 2013, stating the exact date(s) of the change(es) and the circumstances that C4 Environmental used/or caused it to determine its change in generator status.

On May 18, 2009, C4 amended its status to indicate "Large Quantity Handler of Universal Waste". The purpose of this change was to reflect that fact that C4 was managing Universal Waste.

Although not requested by the question, for context, please note that on March 4, 2014, C4 updated its "TCEQ Notification for Hazardous or Industrial Waste Management" form. As reflected in the Facility's current TCEQ Notice of Registration, C4 is listed as a Large Quantity Handler of Universal Waste and a generator of non-hazardous industrial waste.

6. For the period from January 1, 2009 through December 31, 2013:

a. Provide a copy of waste handling procedure.

We have two in-house procedures for handling waste that comes through our facility. The first procedure is called "Waste Acceptance Procedures for Small Containers". This procedure covers Hazardous, Non-Hazardous, and Universal Waste in small containers such as drums, totes, bags, boxes, or buckets. A copy of this procedure is submitted as Attachment 10.

The second procedure is called "Waste Acceptance Procedures for Large Containers". This procedure covers Hazardous and Non Hazardous waste in large containers such as roll-off boxes, vacuum boxes, or vacuum trucks and trailers. A copy of this procedure is submitted as Attachment 11.

i. Do you store hazardous waste at your facility? What is the longest you have stored hazardous waste at the facility?

C4 is a registered transfer facility. It operates a cross-docking warehouse so that as a transporter of waste, drums or smaller containers are taken off small trucks, cross the dock and re-loaded onto larger trailers that are destined for the final TSDF. Volumes larger than drums are brought onto our yard and the waste remains loaded on the transport vehicle (roll-off box or vacuum tanker) until it is shipped to the final TSDF. C4 operates pursuant to 30 TAC 335.94, which allows it to hold hazardous wastes at its facility for up to ten days.

ii. Do you bulk hazardous wastes at your facility from different locations? What is the longest you have stored hazardous waste at the facility?

No

iii. Do you generate hazardous waste at your facility? What is the longest you have stored hazardous waste at the facility?

No. Any Hazardous Waste Storage is on the transport vehicle as part of a transportation function.

iv. Do you clean used drums at your facility? If so, describe the process and how you manage the waste.

No. We do receive RCRA empty drums if they are clean and have never contained acutely toxic (P listed) material.

v. Do you clean tankers at your facility? If so, describe the process and how you manage the waste.

Yes. C4 containers (vacuum boxes) and UTS owned vacuum trailers and vacuum trucks are rinsed in between different customer loads if the prior load was non-hazardous. The cleaning and rinsate collection is done on a specially constructed lined/concrete pad and sump area so all rinsate (and rainfall that lands on the pad) are collected. Since C4 and UTS only handle their own trailers and from loads that are non-hazardous, C4 and UTS know, based on process knowledge, that the waste that is collected is classified as Non-hazardous. TCLP testing is performed periodically to verify that the stream is not characteristically hazardous.

vi. Do you segregate your listed hazardous waste from your characteristic hazardous waste? If so, describe the process and how you manage the

different waste streams.

All hazardous waste brought into our facility is cross-docked onto the appropriate trailer or vehicle that corresponds to the final receiving TSDF. All proper Department of Transportation segregation rules are followed when loading our outbound trailers. A copy of our waste handling procedures has been submitted as Attachments 10 and 11.

vii. Provide electronic copies of all hazardous waste manifests.

Copies of every shipping document for C4 Environmental Services LLC as the generator from January 1, 2009 thru December 31, 2013 are submitted as Attachments 12 through 20. For the same period, copies of every Uniform Hazardous Waste Manifest with a Hazardous Waste Shipping Name with our customers as the generator and C4/UTS Environmental as the transporter are submitted as Attachments 21-62.

b. Provide the following documentation regarding any hazardous waste determinations conducted on each solid waste:

C4 does not generate Hazardous Waste. It does operate as a registered Large Quantity Handler of Universal Hazardous Waste. Descriptions of every waste stream that we generate, along with an explanation of how we characterized the waste, profiled the waste to the final TSDF, and any analysis we did to verify our determination have been covered in the previous section 2, h.

i. Provide analytical data and/or knowledge of process documentation and/or basis used for your hazardous waste determination in accordance with 40 CFR 262.11 and 40 CFR 268.7.

Section 2, h

ii. Identify the point of generation for which you conducted the hazardous waste determination (i.e., where in the process the determination sample was taken or where in the process your knowledge of process determination was made). For this response, please provide the use of a diagram in addition to a narrative.

Section 2, h

c. Identify and describe how each solid and/or hazardous waste is managed onsite (i.e., stored, treated, and/or recycled), including the number of days stored on site and the manner and place(s) of storage. Please support this response with current photographs (photographs taken within 7 days of C4 Environmental's receipt of this Request) of C4 Environmental's waste management areas/locations at its Houston location. These photographs should be date and time stamped.

For small containers (drums, totes, pallets, or pails), if the material is a waste (hazardous or non-hazardous) the waste is picked up from our customers site, shipped on a Uniform Manifest, brought to our facility for transfer to a different vehicle or shipped directly to the final TSDF. If the material is a Universal Waste it is received, consolidated or transferred to the outbound container, and shipped to the final TSDF. All Universal Waste is tracked in-bound and out-bound. A copy of our Waste Acceptance Procedures for Small Containers is submitted as Attachment 10.

For large containers (roll-off boxes, vacuum boxes, vacuum tankers, etc.), the waste (hazardous or non-hazardous) is picked up from our customers site, shipped on a Uniform Waste Manifest, and either brought to our transfer facility for transfer to a different vehicle or shipped directly to the final TSDF. All operations are consistent with normal waste transportation. All waste remains in the primary transportation container from the time it leaves our customer site until it is received at the final TSDF. A copy of our Waste Acceptance Procedures for Large Containers is submitted as Attachment 11.

Photographs of these processes are submitted as Attachment 63, Photo 001 – Photo 034.

- d. Provide copies of the waste management log showing dates of waste generation and dates of shipment for the period of January 1, 2009 through December 31, 2013.**

Due to the vague nature of this request, for the dates requested, we have submitted for review our Waste Tracking log as Attachment 64 and our Universal Tracking Log from 2009-2012 as Attachment 65 and our Universal Tracking Log for 2013 as Attachment 66.

- e. Identify each treatment, storage, and/or disposal ("TSD") facility to which you sent waste and provide copies of the waste profile for each waste stream sent to each facility.**

Due to the vague nature of this request, we have submitted for review a list of all TSDF and Recycling facilities that C4 Environmental has shipped to as the generator as Attachment 67. We are also submitting all out-bound disposal profiles for each applicable stream that C4 Environmental has generated as attachments 68, 69, 70, and 71.

- f. Provide information about the shipments of waste that have been rejected by each respective TSD facility, including a narrative of why the waste was rejected and how C4 Environmental eventually handled or managed said waste.**

No know rejections have occurred.

- g. Provide information regarding your understanding of how the wastes listed in question 6(e) are managed at each respective TSD facility and provide the basis for this understanding**

A list of these facilities and a description of their capabilities are submitted as Attachment 67.

- 7. For the period of January 1, 2009 through December 31, 2013, provide the following information about all other companies or contractors who generated waste at your facility:**

- a. The other companies' or contractors' legal names, addresses, telephone numbers, and current operators.**

The relationship between C4 Environmental Services LLC and MZTech, Inc d.b.a. UTS Environmental has been explained in section 2, e. Our site info is as follows: 9000 Liberty Road, Houston Texas 77028. Phone number (713) 670-0200 and fax number (713) 670-0404. No other company or contractor operates at our facility.

- b. Provide a description of the other companies' or contractors' industrial processes, and include the Standard Industrial Code (SIC) or North American Industry**

Classification System (NAICS) code.

No other company or contractor operates at our facility.

- c. Provide information about hazardous waste other companies or contractors generated and the management method of those wastes.**

No other company or contractor operates at our facility.

- 8. For the period of January 1, 2009 through December 31, 2013, provide a copy of your personnel training program and revisions for handling and managing hazardous wastes during standard and emergency operations. At a minimum, include personnel names, positions, and responsibilities. Are there additional personnel who manage hazardous waste at the facility which did not receive the training? What was the date of your last of such training and please list the personnel who received the training?**

We have submitted for review our Hazardous Waste Operations and other Emergency Procedures schedule as Attachment 72. It explains what training programs we have in place and the dates the various programs were implemented and revised.

We have also submitted for review our most recent version of our corporate Health & Safety Plan as Attachment 73. It is provided to all employees and our employees are trained on the various topics within the plan. We have submitted a list of key personnel that routinely manage hazardous waste at our facility as Attachment 74.

- 9. For the period of January 1, 2009 through December 31, 2013, provide a copy of your contingency plan, emergency procedures, and revisions for emergencies, including procedures for minimizing hazards from any planned or unplanned releases of hazardous wastes from your facility. Please indicate the date these plan(s) and procedures were developed, established, and implemented.**

Same information covered in #8

- 10. For the period of January 1, 2009 through December 31, 2013, provide a copy of each operating procedure used at your facility to manage hazardous waste in containers and tanks. Please indicate the date these plan(s) and procedures were developed, established, and implemented.**

Because we operate a transportation 10-day operation, no waste (other than Universal Waste) is transferred from its original container. The waste simply passes through our facility to its final TSD destination in its original container. Our Operating procedures have been updated as the company has grown and revised as needed. A copy of our most recent version of our "Acceptance Procedures for Small Containers" is submitted as Attachment 10, and our "Acceptance Procedures for Large Containers" are submitted as Attachment 11.

Statement of Certification Attached

END OF RESPONSE

#63
Recycle Bin
SanDiskSecureAccessV2.0
#1 RCRA Subtitle C 10 Form 05 08 2006.pdf
#2 TCEQ Core Data Form- 7200 Lake Houston Pkwy..pdf
#3 TCEQ- Initial notification- 7200 Lake Houston Pkwy 05 18 2006.pdf
#4 TCEQ-EPA Notification 05 18 2009.pdf
#5 TCEQ notification 05 18 2009.pdf
#6 TCEQ Core Data Form Update 05 18 2009.pdf
#7 RCRA Subtitle C 10 Form 07 20 2010.pdf
#8 C4 NOR July 2010.pdf
#9 C4 NOR Sept 2010.pdf
#10 Waste Acceptance Procedures for Small Containers.pdf
#11 Waste Acceptance Procedures for Large Containers.pdf
#12 Shipping Documents for C4 generated streams for 2009 & 2010.pdf
#13 Shipping Documents for C4 generated streams for 2011 Part 1 of 2.pdf
#14 Shipping Documents for C4 generated streams for 2011 Part 2 of 2.pdf
#15 Shipping Documents for C4 generated streams for 2012 part 1 of 2.pdf
#16 Shipping Documents for C4 generated streams for 2012 part 2 of 2.pdf
#17 Shipping Documents for C4 generated streams for 2013 Part 1 of 4.pdf
#18 Shipping Documents for C4 generated streams for 2013 Part 2 of 4.pdf
#19 Shipping Documents for C4 generated streams for 2013 Part 3 of 4.pdf
#20 Shipping Documents for C4 generated streams for 2013 Part 4 of 4.pdf
#21 Uniform Haz Waste Manifests from C4-UTS transportation 2009 Part 1.pdf
#22 Uniform Haz Waste Manifests from C4-UTS transportation 2009 Part 2.pdf
#23 Uniform Haz Waste Manifests from C4-UTS transportation 2009 Part 3.pdf
#24 Uniform Haz Waste Manifests from C4-UTS transportation 2009 Part 4.pdf
#25 Uniform Haz Waste Manifests from C4-UTS transportation 2010 Part 3.pdf
#26 Uniform Haz Waste Manifests from C4-UTS transportation 2010 Part 4.pdf
#27 Uniform Haz Waste Manifests from C4-UTS transportation 2010 Part 5.pdf
#28 Uniform Haz Waste Manifests from C4-UTS transportation 2010 Part 6.pdf
#29 Uniform Haz Waste Manifests from C4-UTS transportation 2010 Part 7.pdf
#30 Uniform Haz Waste Manifests from C4-UTS transportation 2010 Part 8.pdf
#31 Uniform Haz Waste Manifest from C4-UTS transportation 2011 Part 8.pdf
#32 Uniform Haz Waste Manifests from C4-UTS transportation 2011 Part 9.pdf
#33 Uniform Haz Waste Manifests from C4-UTS transportation 2012 Part 4.pdf
#34 Uniform Haz Waste Manifests from C4-UTS transportation 2012 Part 5.pdf
#35 Uniform Haz Waste Manifests from C4-UTS transportation 2012 Part 6.pdf
#36 Uniform Haz Waste Manifests from C4-UTS transportation 2012 Part 7.pdf
#37 Uniform Haz Waste Manifests from C4-UTS transportation 2012 Part 8.pdf
#38 Uniform Haz Waste Manifests from C4-UTS transportation 2013 Part 13.pdf
#39 Uniform Haz Waste Manifests from C4-UTS transportation 2010 Part 1.pdf
#40 Uniform Haz Waste Manifests from C4-UTS transportation 2010 Part 2.pdf
#41 Uniform Haz Waste Manifests from C4-UTS transportation 2011 Part 1.pdf
#42 Uniform Haz Waste Manifests from C4-UTS transportation 2011 Part 2.pdf
#43 Uniform Haz Waste Manifests from C4-UTS transportation 2011 Part 3.pdf
#44 Uniform Haz Waste Manifests from C4-UTS transportation 2011 Part 4.pdf
#45 Uniform Haz Waste Manifests from C4-UTS transportation 2011 part 5.pdf
#46 Uniform Haz Waste Manifests from C4-UTS transportation 2011 part 6.pdf
#47 Uniform Haz Waste Manifests from C4-UTS transportation 2011 Part 7.pdf
#48 Uniform Haz Waste Manifests from C4-UTS transportation 2012 Part 1.pdf
#49 Uniform Haz Waste Manifests from C4-UTS transportation 2012 Part 2.pdf
#50 Uniform Haz Waste Manifests from C4-UTS transportation 2012 part 3 .pdf
#51 Uniform Haz Waste Manifests from C4-UTS transportation 2013 Part 1.pdf
#52 Uniform Haz Waste Manifests from C4-UTS transportation 2013 Part 2.pdf
#53 Uniform Haz Waste Manifests from C4-UTS transportation 2013 part 3.pdf
#54 Uniform Haz Waste Manifests from C4-UTS transportation 2013 part 4.pdf
#55 Uniform Haz Waste Manifests from C4-UTS transportation 2013 Part 5.pdf
#56 Uniform Haz Waste Manifests from C4-UTS transportation 2013 Part 6.pdf
#57 Uniform Haz Waste Manifests from C4-UTS transportation 2013 Part 7.pdf
#58 Uniform Haz Waste Manifests from C4-UTS transportation 2013 part 8 .pdf
#59 Uniform Haz Waste Manifests from C4-UTS transportation 2013 Part 9.pdf
#60 Uniform Haz Waste Manifests from C4-UTS transportation 2013 Part 10.pdf
#61 Uniform Haz Waste Manifests from C4-UTS transportation 2013 Part 11.pdf
#62 Uniform Haz Waste Manifests from C4-UTS transportation 2013 part 12 .pdf
#64 Waste Tracking Log.xlsx
#65 Universal Waste Container Tracking Sheet 2009-2012.xlsx
#66 Universal Waste Container Tracking Sheet 2013.xlsx
#67 TSDF list.pdf
#68 Profiles for C4 Universal Paint Waste to various TSDF.pdf
#69 Profile info for C4 Non Haz Sump collection waste.pdf
#70 Profile info for C4 Non Haz site cleanup & PPE.pdf
#71 Profile info for C4 Non Haz Fire Extinguisher Power generated by C4.pdf
#72 Hazard%20waste%20operations%20and%20other%20emergency%20procedures[1].pdf
#73 C4 - UTS Health_and_Safety_Plan .pdf
#74 Waste Management Personnel.pdf
SanDiskSecureAccessV2_win.exe
XNAME.CRS
XNAME.LIB

Steve Morton
Partner
smorton@MMandG.com

MOLTZ | MORTON | GLENN
LLP
Moltz Morton & Glenn
5113 Southwest
Parkway
Austin, TX 78735
Phone: (512) 439-2172
Cell: (512) 796-3856
www.MMandG.com

Conference Call In Number (866) 228-9900

KF5ORD

RE: C4 Environmental Services LLC
Information Request

ENCLOSURE B

STATEMENT OF CERTIFICATION

C4 Environmental Services LLC – Houston, Texas

I certify that I am authorized to respond to this information request on behalf of C4 Environmental Services LLC and I certify under penalty of perjury that the foregoing is true and correct. Executed on June 25th, 2014.



(Signature)

Brien Todd Conner

(Name)

President

(Title)

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Notification for Hazardous or Industrial Waste Management

Please print or type. Definitions and codes can be found in the Hazardous or Industrial Waste Form Instructions. Changes not related to Waste Streams or Waste Management Units must be accompanied by TCEQ Core Data Form (TCEQ 10400).

Part I. General Registration Information

Section A. Notification Type and Registration Numbers

If this is an Initial Notification, leave registration numbers blank. If updating existing Notice of Registration, provide current registration numbers.

1. Notification type (check one): ☐ Initial ☒ Update

2. Solid Waste Registration Number: 87955

3. EPA Identification Number: TXR000070243

4. Customer Reference Number: CN 603047242

5. Regulated Entity Number: RN 104967724

Section B. Company Information

1. Company Name (as listed with the Secretary of State): C 4 Environmental Services LLC

2. Site Name: 9000 Liberty Rd. Houston, TX 77028

3. Registration Type (check all that apply): ☐ Generator ☐ Receiver ☒ Transporter ☐ Recycler

4. Contact Information: Todd Conner, President

(First Name, Last Name, Title)

Telephone Number: (713) 670-0200 Fax Number: (713) 670-0404 Email: tconner@c4env.com

5. Waste Handler Status (check all that apply):

☒ Not Applicable

☐ Permitted TSD

☐ Interim TSD

☐ Recycler

Section C. Generator Information

If your facility does not fit the definition of a "Generator" skip to Section D:

1. Generator Type (check all that apply): ☒ Industrial ☐ Non-industrial ☐ Railroad Commission

2. Hazardous Waste Generation Status (check one):

☐ Large Quantity Generator (LQG)

♦ 2,200 pounds (1,000 kilograms) or more of hazardous waste and/or
♦ 2.2 pounds (1 kilogram) or more of acutely hazardous waste

☐ Small Quantity Generator (SQG)

♦ between 220 and 2,200 pounds (100 and 1,000 kilograms) of hazardous waste and
♦ less than 2.2 pounds (1 kilogram) of acutely hazardous waste

☐ Industrial Conditionally Exempt Small Quantity Generator (CESQG)

♦ 220 pounds (100 kilograms) or less of hazardous waste and
♦ less than 2.2 pounds (1 kilogram) of acutely hazardous waste and
♦ 220 pounds (100 kilograms) or more of industrial Class 1 waste

☒ Universal Waste Only

♦ All hazardous waste generated is classified as Universal Waste and no reportable Class 1 waste is generated at the site

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Notification for Hazardous or Industrial Waste Management

Section D. Receiver Information

If your facility does not fit the definition of a "Receiver" skip to Section E

1. Facility Category (check one): ☒ Commercial ☐ Captive ☐ Captured
2. Class of Waste Received for treatment, storage or disposal (check all that apply):
☒ Hazardous ☒ Class 1 ☒ Class 2 ☐ Class 3
3. If you receive waste from off-site and recycle it, see TCEQ Form 0524 "Notification Form for Receiving and Recycling Hazardous or Industrial Waste".

Section E. Transporter Information

If your facility does not fit the definition of a "Transporter" skip to Section F

*To Transport hazardous waste you must have an EPA identification number. See EPA RCRA Subtitle C Site Identification Form (EPA Form 8700-12).

- | | | |
|--------------------------------------------------------------------|-----------------------------------------|-----------------------------|
| 1. Carrier Classification (answer "yes" or "no" to each question): | | |
| a. Do you transport for hire? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| b. Do you transport your own waste? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| c. Is this site a transfer facility? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
2. Types of waste transported (check all that apply):
☒ Hazardous* ☒ Class 1 ☒ Class 2 ☐ Class 3

Section F. Certification of Company Information

I certify that the information submitted herein is complete and accurate to the best of my knowledge

Todd Conner

Printed Preparer's Name

(713) 670-0200

Telephone Number

T. Conner

Preparer's Signature

5/18/09

Date

Mail all completed registration forms

(i.e., Notification for Hazardous or Industrial Waste Management, TCEQ 00002, TCEQ Core Data Form, TCEQ 10400, EPA RCRA Subtitle C Site Identification Form, EPA Form 8700-12)

Texas Commission on Environmental Quality
Permitting and Registration Support Division
Registration and Reporting Section, MC 129
PO Box 13087
Austin, TX 78711-3087

If you have questions on how to fill out this form or about the Industrial and Hazardous Waste Program, please contact us at 512/239-6413. Individuals are entitled to request and review their personal information the agency gathers on its forms. They may also have any errors in their information corrected. Administrative changes must be made on the TCEQ Core Data Form (TCEQ 10400). To review such information, contact us at 512/239-3282.

**TCEQ TEXAS COMMISSION ON ENVIRONMENTAL QUALITY**[Customer Search](#) | [Regulated Entity Search](#) | [Search Results](#) | [Report Data Errors](#) | [Central Registry Home](#)[BACK TO: Customer Search Results](#)**Central Registry Query - Customer Information**
Customer Information

CN Number: CN603047242
Name: C4 ENVIRONMENTAL SERVICES LLC
Legal Name:
Customer Type: CORPORATION

Affiliated Regulated Entities - Current

Your Search Returned 1 Current Affiliation Records (View History)


1-1 of 1 Records

RN Number	Regulated Entity Name ▲	Location	County	Customer's Role	More Information
RN104967724	C4 ENVIRONMENTAL SERVICES	7200 S LAKE HOUSTON PKWY HOUSTON TX 77049 2609	HARRIS	OWNER OPERATOR	

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[Drinking Water & Water Availability](#) | [Reporting](#) | [Environmental Quality](#) | [Assistance, Education & Participation](#)
[Pollution Prevention & Recycling](#) | [Contracts, Funding & Fees](#)[About TCEQ](#) | [Contact Us](#)

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SEND COMPLETED FORM TO: The Appropriate State or EPA Regional Office.	United States Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION FORM		
1. Reason for Submittal (See instructions on page 13.) MARK ALL BOX(ES) THAT APPLY	Reason for Submittal: <input type="checkbox"/> To provide Initial Notification of Regulated Waste Activity (to obtain an EPA ID Number for hazardous waste, universal waste, or used oil activities) <input checked="" type="checkbox"/> To provide Subsequent Notification of Regulated Waste Activity (to update site identification information) <input type="checkbox"/> As a component of a First RCRA Hazardous Waste Part A Permit Application <input type="checkbox"/> As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment # _____) <input type="checkbox"/> As a component of the Hazardous Waste Report		
2. Site EPA ID Number (page 14)	EPA ID Number T X R 0 0 0 0 7 0 2 4 3		
3. Site Name (page 14)	Name: C 4 Environmental Services LLC		
4. Site Location Information (page 14)	Street Address: 9000 Liberty Road		
	City, Town, or Village: Houston	State: Texas	
	County Name: Harris	Zip Code: 77028	
5. Site Land Type (page 14)	Site Land Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		
6. North American Industry Classification System (NAICS) Code(s) for the Site (page 14)	A. 5 4 1 6 2 0	B. _____	
	C. _____	D. _____	
7. Site Mailing Address (page 15)	Street or P. O. Box: P. O. Box 692375		
	City, Town, or Village: Houston		
	State: Texas		
	Country: USA	Zip Code: 77028	
8. Site Contact Person (page 15)	First Name: Brien	MI: T	Last Name: Conner
	Phone Number: 713-670-0200 Extension:		Email address: tconner@c4env.com
9. Operator and Legal Owner of the Site (pages 15 and 16)	A. Name of Site's Operator: C 4 Environmental Services LLC		Date Became Operator (mm/dd/yyyy): 05/18/2009
	Operator Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		
	B. Name of Site's Legal Owner: C 4 Liberty Holdings LLC		Date Became Owner (mm/dd/yyyy): 12/31/2008
	Owner Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		

9. Legal Owner (Continued) Address	Street or P. O. Box: 9000 Liberty Road	
	City, Town, or Village: Houston	
	State: Texas	
	Country: USA	Zip Code: 77028

10. Type of Regulated Waste Activity
Mark "Yes" or "No" for all activities; complete any additional boxes as instructed. (See instructions on pages 17 to 20.)

A. Hazardous Waste Activities
Complete all parts for 1 through 6.

☐ ☒ **1. Generator of Hazardous Waste**
If "Yes", choose only one of the following - a, b, or c.

☐ a. LQG: Greater than 1,000 kg/mo (2,200 lbs./mo.) of non-acute hazardous waste; or

☐ b. SQG: 100 to 1,000 kg/mo (220 - 2,200 lbs./mo.) of non-acute hazardous waste; or

☐ c. CESQG: Less than 100 kg/mo (220 lbs./mo.) of non-acute hazardous waste

In addition, indicate other generator activities.

☐ ☒ d. United States Importer of Hazardous Waste

☐ ☒ e. Mixed Waste (hazardous and radioactive) Generator

☐ ☒ **2. Transporter of Hazardous Waste**

☐ ☒ **3. Treater, Storer, or Disposer of Hazardous Waste (at your site)** Note: A hazardous waste permit is required for this activity.

☐ ☒ **4. Recycler of Hazardous Waste (at your site)**

☐ ☒ **5. Exempt Boiler and/or Industrial Furnace**
If "Yes", mark each that applies.

☐ a. Small Quantity On-site Burner Exemption

☐ b. Smelting, Melting, and Refining

☐ ☒ **6. Underground Injection Control**

B. Universal Waste Activities

☒ ☐ **1. Large Quantity Handler of Universal Waste (accumulate 5,000 kg or more) [refer to your State regulations to determine what is regulated]. Indicate types of universal waste mark all boxes that apply:**

	<u>Manage</u>
a. Batteries	<input checked="" type="checkbox"/>
b. Pesticides	<input checked="" type="checkbox"/>
c. Mercury containing equipment	<input checked="" type="checkbox"/>
d. Lamps	<input checked="" type="checkbox"/>
e. Other (specify) Paint Related Materials	<input checked="" type="checkbox"/>
f. Other (specify) _____	<input type="checkbox"/>
g. Other (specify) _____	<input type="checkbox"/>

☐ ☒ **2. Destination Facility for Universal Waste**
Note: A hazardous waste permit may be required for this activity.

C. Used Oil Activities
Mark all boxes that apply.

☐ ☒ **1. Used Oil Transporter**
If "Yes", mark each that applies.

☐ a. Transporter

☐ b. Transfer Facility

☐ ☒ **2. Used Oil Processor and/or Re-refiner**
If "Yes", mark each that applies.

☐ a. Processor

☐ b. Re-refiner

☐ ☒ **3. Off-Specification Used Oil Burner**

☐ ☒ **4. Used Oil Fuel Marketer**
If "Yes", mark each that applies.

☐ a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner

☐ b. Marketer Who First Claims the Used Oil Meets the Specifications

EPA ID NO: T X R 0 0 0 0 7 0 2 4 3

OMB#: 2050-0028 Expires 06/30/2009

11. Description of Hazardous Wastes (See instructions on page 21.)

A. Waste Codes for Federally Regulated Hazardous Wastes. Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more spaces are needed.

B. Waste Codes for State-Regulated (i.e., non-Federal) Hazardous Wastes. Please list the waste codes of the State-regulated hazardous wastes handled at your site. List them in the order they are presented in the regulations. Use an additional page if more spaces are needed for waste codes.

12. Comments (See instructions on page 21.)

13. Certification. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

For the RCRA Hazardous Waste Part A Permit Application, all operator(s) and owner(s) must sign (see 40 CFR 270.10 (b) and 270.11). (See instructions on page 21.)

Signature of operator, owner, or an authorized representative	Name and Official Title (type or print)	Date Signed (mm/dd/yyyy)
<i>T. Conner</i>	Todd Conner, President C 4 Environmental Services LLC	05/18/2009

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Notification for Hazardous or Industrial Waste Management

Please print or type. Definitions and codes can be found in the Hazardous or Industrial Waste Form Instructions. Changes not related to Waste Streams or Waste Management Units must be accompanied by TCEQ Core Data Form (TCEQ 10400).

Part I. General Registration Information

Section A. Notification Type and Registration Numbers

If this is an Initial Notification, leave registration numbers blank. If updating existing Notice of Registration, provide current registration numbers.

1. Notification type (check one): ☐ Initial ☒ Update

2. Solid Waste Registration Number: 87955

3. EPA Identification Number: TXR000070243

4. Customer Reference Number: CN 603047242

5. Regulated Entity Number: RN 104967724

Section B. Company Information

1. Company Name (as listed with the Secretary of State): C 4 Environmental Services LLC

2. Site Name: 9000 Liberty Rd. Houston, TX 77028

3. Registration Type (check all that apply): ☐ Generator ☐ Receiver ☒ Transporter ☐ Recycler

4. Contact Information: Todd Conner, President
(First Name, Last Name, Title)

Telephone Number: (713) 670-0200 Fax Number: (713) 670-0404 Email: tconner@c4env.com

5. Waste Handler Status (check all that apply): ☒ Not Applicable ☐ Permitted TSD ☐ Interim TSD ☐ Recycler

Section C. Generator Information

If your facility does not fit the definition of a "Generator" skip to Section D

1. Generator Type (check all that apply): ☒ Industrial ☐ Non-industrial ☐ Railroad Commission

2. Hazardous Waste Generation Status (check one):	<input type="checkbox"/> Large Quantity Generator (LQG)	♦ 2,200 pounds (1,000 kilograms) or more of hazardous waste and/or ♦ 2.2 pounds (1 kilogram) or more of acutely hazardous waste
	<input type="checkbox"/> Small Quantity Generator (SQG)	♦ between 220 and 2,200 pounds (100 and 1,000 kilograms) of hazardous waste and ♦ less than 2.2 pounds (1 kilogram) of acutely hazardous waste
	<input type="checkbox"/> Industrial Conditionally Exempt Small Quantity Generator (CESQG)	♦ 220 pounds (100 kilograms) or less of hazardous waste and ♦ less than 2.2 pounds (1 kilogram) of acutely hazardous waste and ♦ 220 pounds (100 kilograms) or more of industrial Class 1 waste
	<input checked="" type="checkbox"/> Universal Waste Only	♦ All hazardous waste generated is classified as Universal Waste and no reportable Class 1 waste is generated at the site

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Notification for Hazardous or Industrial Waste Management

Section D. Receiver Information

If your facility does not fit the definition of a "Receiver" skip to Section E

1. Facility Category (check one): ☒ Commercial ☐ Captive ☐ Captured
2. Class of Waste Received for treatment, storage or disposal (check all that apply):
☒ Hazardous ☒ Class 1 ☒ Class 2 ☐ Class 3
3. If you receive waste from off-site and recycle it, see TCEQ Form 0524 "Notification Form for Receiving and Recycling Hazardous or Industrial Waste".

Section E. Transporter Information

If your facility does not fit the definition of a "Transporter" skip to Section F

*To Transport hazardous waste you must have an EPA identification number. See EPA RCRA Subtitle C Site Identification Form (EPA Form 8700-12).

1. Carrier Classification (answer "yes" or "no" to each question):

a. Do you transport for hire?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
b. Do you transport your own waste?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
c. Is this site a transfer facility?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
2. Types of waste transported (check all that apply):
☒ Hazardous* ☒ Class 1 ☒ Class 2 ☐ Class 3

Section F. Certification of Company Information

I certify that the information submitted herein is complete and accurate to the best of my knowledge

Todd Conner

Printed Preparer's Name

(713) 670-0200

Telephone Number

T. Conner

Preparer's Signature

5/18/09

Date

Mail all completed registration forms

(i.e., Notification for Hazardous or Industrial Waste Management, TCEQ 00002; TCEQ Core Data Form, TCEQ 10400; EPA RCRA Subtitle C Site Identification Form, EPA Form 8700-12)

Texas Commission on Environmental Quality
Permitting and Registration Support Division
Registration and Reporting Section, MC 129
PO Box 13087
Austin, TX 78711-3087

If you have questions on how to fill out this form or about the Industrial and Hazardous Waste Program, please contact us at 512/239-6413. Individuals are entitled to request and review their personal information the agency gathers on its forms. They may also have any errors in their information corrected. Administrative changes must be made on the TCEQ Core Data Form (TCEQ 10400). To review such information, contact us at 512/239-3282.

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Notification for Hazardous or Industrial Waste Management

Please print or type. Definitions and codes can be found in the Hazardous or Industrial Waste Form Instructions. Changes not related to Waste Streams or Waste Management Units must be accompanied by TCEQ Core Data Form (TCEQ 10400). You may copy this section as needed for each waste stream at your site.

Part II. Waste Stream Notification

Section A. Notification Type and Registration Numbers

If this is an Initial Notification, leave registration numbers blank. If updating existing Notice of Registration, provide current registration numbers.

1. Notification type (check one): ☐ Initial ☐ Update

2. Solid Waste Registration Number: _____

3. EPA Identification Number: _____

4. Customer Reference Number: CN _____

5. Regulated Entity Number: RN _____

6. Company Name (as listed with the Secretary of State): _____

7. Site Name: _____

Section B. Waste Stream Information

1. Texas Waste Code: _____
Sequence Number

Texas Form Code
(See Appendix B)

H 1 2 3
Class Code
(Circle Class Code)

2. Waste Description and Generating Process: _____

3. Date of Generation: _____ / _____ / _____
Month Day Year

4. Origin Code (check one):

- | | |
|--------------------------|---------------------------------------------------------------------------------------------------------------------|
| <input type="checkbox"/> | 1. The waste was generated on-site from a product process or service activity. |
| <input type="checkbox"/> | 2. The waste resulted from a spill clean-up, equipment decommissioning, or emergency removal by company. |
| <input type="checkbox"/> | 3. The waste was derived from the on-site management of a non-hazardous waste. |
| <input type="checkbox"/> | 4. The waste was received from off-site and was not recycled or treated on-site. |
| <input type="checkbox"/> | 5. The waste was residual from the on-site treatment, disposal or recycling of previously existing hazardous waste. |
| <input type="checkbox"/> | 6. The waste was from a state, federal, or locally funded cleanup. |
| <input type="checkbox"/> | 7. The waste was from a corrective action or closure. |

5. New Chemical Substance: ☐ Yes ☐ No

If you check "yes" and the waste is Class 2 or Class 3, attach copies of all information, documentation and rationale used to classify the waste.

6. Waste Management Location (check all that apply): ☐ On-site ☐ Off-site

Provide the 3-digit waste management unit sequence number for any **ON-SITE** waste management units where this waste is treated, stored or disposed. If the waste management unit is new, leave blank, and include waste stream in Part III Waste Management Unit Notification, question 9.

7. If this waste is recycled, see TCEQ Form 0525 "Generator Notification Form for Recycling Hazardous or Industrial Waste".

Please provide the 8-digit Texas Waste Code from Item 1 of Section B: _____

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If this waste is non-hazardous, skip Questions 8-13 and go to Section C. Certification of Waste Stream Information

8. EPA Hazardous Waste Numbers (EPA Codes):

9. North American Industry Classification System (NAICS) 6-digit Code: _____

10. Source Code (See Appendix C): G

11. Mixed Radioactive Waste: ☐ Yes ☐ No

12. System Type Code (See Appendix D): H
*Only fill out System Type Code if you selected Origin Code 5 from the previous page.

13. EPA Form Code (See Appendix E): W

Section C. Certification of Waste Stream Information

I certify that the information submitted herein is complete and accurate to the best of my knowledge.

Printed Preparer's Name

Telephone Number

Preparer's Name

Date

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Notification for Hazardous or Industrial Waste Management

Please print or type. Definitions and codes can be found in the Hazardous or Industrial Waste Form Instructions. Changes not related to Waste Streams or Waste Management Units must be accompanied by TCEQ Core Data Form (TCEQ 10400). You may copy this section as needed for each waste management unit at your site.

Part III. Waste Management Unit Notification

Section A. Notification Type and Registration Numbers

If this is an Initial Notification, leave registration numbers blank. If updating existing Notice of Registration, provide current registration numbers.

1. Notification type (check one): ☐ Initial ☐ Update

2. Solid Waste Registration Number: _____

3. EPA Identification Number: _____

4. Customer Reference Number: CN _____

5. Regulated Entity Number: RN _____

6. Company Name (as listed with the Secretary of State): _____

7. Site Name: _____

Section B. Waste Management Unit Information

1. Unit Sequence Number: _____

2. Unit Type Code: _____
(See Appendix F)

3. Capacity: _____

4. Unit Description: _____

5. Is this unit permitted? ☐ Yes ☐ No

5a. IHW Permit No. _____

5b. UIC Permit No. _____

6. Unit Registration Status (check one): ☐ Active ☐ Inactive ☐ Not Yet Built ☐ Under Construction

7. Unit Regulatory
Status *Check one):

Non-hazardous Regulated

Permitted Non-hazardous Industrial Unit

UIC Permitted

UIC Registration

RCRA Permitted Unit

RCRA Permit Exempt <90 Day Storage

RCRA Permit Exempt - Accumulation Time

RCRA Permit Exempt - Recycling Unit per §335.24

RCRA Permit Exemption - Totally Enclosed
Treatment

RCRA Permit Exempt - Wastewater Treatment Unit

8. System Type Code (See Appendix D): H H H H

9. Type of off-site waste managed in unit (check all that apply):

☐ Does Not Apply

☐ Hazardous

☐ Industrial Class 1

☐ Industrial Class 2

☐ Industrial Class 3

10. List the waste streams (Texas Waste Code) generated on-site and managed in this unit:

Section C. Certification of Waste Management Unit Information

I certify that the information submitted herein is complete and accurate to the best of my knowledge

Printed Preparer's Name _____

Telephone Number _____

Preparer's Signature _____

Date _____



TCEQ Use Only

TCEQ Core Data Form

For detailed instructions regarding completion of this form, please read the Core Data Form Instructions or call 512-239-5175.

SECTION I: General Information

1. Reason for Submission (If other is checked please describe in space provided)			
<input type="checkbox"/> New Permit, Registration or Authorization (Core Data Form should be submitted with the program application)			
<input type="checkbox"/> Renewal (Core Data Form should be submitted with the renewal form)		<input checked="" type="checkbox"/> Other	Updated information
2. Attachments Describe Any Attachments: (ex. Title V Application, Waste Transporter Application, etc.)			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		EPA form 8700-12, TCEQ Form 00002	
3. Customer Reference Number (if issued)		Follow this link to search for CN or RN numbers in Central Registry**	4. Regulated Entity Reference Number (if issued)
CN 603047242			RN 104967724

SECTION II: Customer Information

5. Effective Date for Customer Information Updates (mm/dd/yyyy)		5/18/09	
6. Customer Role (Proposed or Actual) - as it relates to the Regulated Entity listed on this form. Please check only one of the following:			
<input type="checkbox"/> Owner	<input checked="" type="checkbox"/> Operator	<input type="checkbox"/> Owner & Operator	
<input type="checkbox"/> Occupational Licensee	<input type="checkbox"/> Responsible Party	<input type="checkbox"/> Voluntary Cleanup Applicant	<input type="checkbox"/> Other: _____
7. General Customer Information			
<input type="checkbox"/> New Customer		<input checked="" type="checkbox"/> Update to Customer Information	<input type="checkbox"/> Change in Regulated Entity Ownership
<input type="checkbox"/> Change in Legal Name (Verifiable with the Texas Secretary of State)		<input type="checkbox"/> No Change**	
**If "No Change" and Section I is complete, skip to Section III - Regulated Entity Information.			
8. Type of Customer:		<input checked="" type="checkbox"/> Corporation	<input type="checkbox"/> Individual
<input type="checkbox"/> City Government	<input type="checkbox"/> County Government	<input type="checkbox"/> Federal Government	<input type="checkbox"/> Sole Proprietorship- D.B.A
<input type="checkbox"/> Other Government	<input type="checkbox"/> General Partnership	<input type="checkbox"/> Limited Partnership	<input checked="" type="checkbox"/> Other: LLC
9. Customer Legal Name (If an Individual, print last name first: ex: Doe, John)		If new Customer, enter previous Customer below	
C 4 Environmental Services LLC		End Date:	
10. Mailing Address:			
P. O. Box 692375			
City	Houston	State	TX
ZIP	77028	ZIP + 4	
11. Country Mailing Information (if outside USA)		12. E-Mail Address (if applicable)	
USA		tconner@c4env.com	
13. Telephone Number		14. Extension or Code	
(713) 670-0200			
15. Fax Number (if applicable)			
(713) 670-0404			
16. Federal Tax ID (9 digits)		17. TX State Franchise Tax ID (11 digits)	
841709710		32018799307	
18. DUNS Number (if applicable)		19. TX SOS Filing Number (if applicable)	
20. Number of Employees		21. Independently Owned and Operated?	
<input checked="" type="checkbox"/> 0-20 <input type="checkbox"/> 21-100 <input type="checkbox"/> 101-250 <input type="checkbox"/> 251-500 <input type="checkbox"/> 501 and higher		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

SECTION III: Regulated Entity Information

22. General Regulated Entity Information (If "New Regulated Entity" is selected below this form should be accompanied by a permit application)			
<input type="checkbox"/> New Regulated Entity		<input type="checkbox"/> Update to Regulated Entity Name	<input checked="" type="checkbox"/> Update to Regulated Entity Information
		<input type="checkbox"/> No Change** (See below)	
**If "NO CHANGE" is checked and Section I is complete, skip to Section IV, Preparer Information.			
23. Regulated Entity Name (name of the site where the regulated action is taking place)			
C 4 Liberty Holdings, LLC			

24. Street Address of the Regulated Entity: (No P.O. Boxes)	9000 Liberty Road						
	City	Houston	State	TX	ZIP	77028	ZIP + 4
25. Mailing Address:	P.O. Box 692375						
	City	Houston	State	TX	ZIP	77028	ZIP + 4
26. E-Mail Address:	tconner@c4env.com						
27. Telephone Number	28. Extension or Code		29. Fax Number (if applicable)				
(713) 670-0200			(713) 670-0404				
30. Primary SIC Code (4 digits)	31. Secondary SIC Code (4 digits)	32. Primary NAICS Code (5 or 6 digits)		33. Secondary NAICS Code (5 or 6 digits)			
34. What is the Primary Business of this entity? (Please do not repeat the SIC or NAICS description.)							
Real Estate Holding Company							

Questions 34 – 37 address geographic location. Please refer to the instructions for applicability.

35. Description to Physical Location:	stabilized, fenced yard located in industrial area of Houston, TX 1/4 mile from McCarty Street on Old Liberty Rd.		
36. Nearest City	County	State	Nearest ZIP Code
Houston	Harris	TX	77028
37. Latitude (N) In Decimal:	38. Longitude (W) In Decimal:		
Degrees	Minutes	Seconds	Degrees

39. TCEQ Programs and ID Numbers Check all Programs and write in the permits/registration numbers that will be affected by the updates submitted on this form or the updates may not be made. If your Program is not listed, check other and write it in. See the Core Data Form instructions for additional guidance.

<input type="checkbox"/> Dam Safety	<input type="checkbox"/> Districts	<input type="checkbox"/> Edwards Aquifer	<input checked="" type="checkbox"/> Industrial Hazardous Waste	<input type="checkbox"/> Municipal Solid Waste
			87955	
<input type="checkbox"/> New Source Review – Air	<input type="checkbox"/> OSSF	<input type="checkbox"/> Petroleum Storage Tank	<input type="checkbox"/> PWS	<input type="checkbox"/> Sludge
<input type="checkbox"/> Stormwater	<input type="checkbox"/> Title V – Air	<input type="checkbox"/> Tires	<input type="checkbox"/> Used Oil	<input type="checkbox"/> Utilities
<input type="checkbox"/> Voluntary Cleanup	<input type="checkbox"/> Waste Water	<input type="checkbox"/> Wastewater Agriculture	<input type="checkbox"/> Water Rights	<input type="checkbox"/> Other:

SECTION IV: Preparer Information

40. Name:	Todd Conner	41. Title:	C 4 Environmental Services, Pres
42. Telephone Number	43. Ext./Code	44. Fax Number	45. E-Mail Address
(713) 670-0200		(713) 670-0404	tconner@c4env.com

SECTION V: Authorized Signature

46. By my signature below, I certify, to the best of my knowledge, that the information provided in this form is true and complete, and that I have signature authority to submit this form on behalf of the entity specified in Section II, Field 9 and/or as required for the updates to the ID numbers identified in field 39.

(See the Core Data Form instructions for more information on who should sign this form.)

Company:	C 4 Environmental Services, LLC	Job Title:	President
Name(In Print):	Todd Conner	Phone:	(713) 670-0200
Signature:	<i>T. Conner</i>	Date:	5/18/09

(State Form)
Texas Commission on Environmental Quality
Registration and Reporting Section MC 129
P.O. Box 13087
Austin, TX 78711-3087
Caroline Wersterfer
(512) 239-6413
cwerster@tceq.state.tx.us


7009 3410 0002 4424 2567

United States Postal Service	
CERTIFIED MAIL™ RECEIPT	
(Domestic Mail Only, No Insurance Coverage Provided)	
For delivery information visit our website at www.usps.com	
AUSTIN TX 78711	
Postage	\$ 0.44
Certified Fee	\$2.80
Return Receipt Fee (Endorsement Required)	\$0.00
Restricted Delivery Fee (Endorsement Required)	\$0.00
Total Postage & Fees	\$ 3.24

0100 1 2 JUL 21 2010
Postmark Here
GRANVILLE ELDER ST
07/21/2010

Sent To
\$ 7009 3410 0002 4424 2567
or PO Box No.
City, State, ZIP+4

PS Form 3800, August 2006 See Reverse for Instruc

SEND COMPLETED FORM TO: The Appropriate State or Regional Office.	United States Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION FORM		
1. Reason for Submittal MARK ALL BOX(ES) THAT APPLY	Reason for Submittal: <input type="checkbox"/> To provide an Initial Notification (first time submitting site identification information / to obtain an EPA ID number for this location) <input checked="" type="checkbox"/> To provide a Subsequent Notification (to update site identification information for this location) <input type="checkbox"/> As a component of a First RCRA Hazardous Waste Part A Permit Application <input type="checkbox"/> As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment # _____) <input type="checkbox"/> As a component of the Hazardous Waste Report (If marked, see sub-bullet below) <input type="checkbox"/> Site was a TSD facility and/or generator of $\geq 1,000$ kg of hazardous waste, >1 kg of acute hazardous waste, or >100 kg of acute hazardous waste spill cleanup in one or more months of the report year (or State equivalent LQG regulations)		
2. Site EPA ID Number	EPA ID Number T X R 0 0 0 0 7 0 2 4 3		
3. Site Name	Name: C4 Environmental Services, LLC		
4. Site Location Information	Street Address: 9000 Liberty Road City, Town, or Village: Houston County: Harris State: Texas Country: USA Zip Code: 77028		
5. Site Land Type	<input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		
6. NAICS Code(s) for the Site (at least 5-digit codes)	A. 5 4 1 6 2 0 C. B. D. 		
7. Site Mailing Address	Street or P.O. Box: 9000 Liberty Road City, Town, or Village: Houston State: Texas Country: USA Zip Code: 77028		
8. Site Contact Person	First Name: Brien MI: T Last: Conner Title: President Street or P.O. Box: 9000 Liberty Road City, Town or Village: Houston State: Texas Country: USA Zip Code: 77028 Email: tconner@c4env.com Phone: 713-670-0200 Ext.: Fax: 713-670-0404		
9. Legal Owner and Operator of the Site	A. Name of Site's Legal Owner: C4 Liberty Holdings, LLC Date Became Owner: 12/31/2008 Owner Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other Street or P.O. Box: 9000 Liberty Road City, Town, or Village: Houston Phone: 713-670-0200 State: Texas Country: USA Zip Code: 77028 B. Name of Site's Operator: C4 Environmental Services, LLC Date Became Operator: 5/18/2009 Operator Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		

EPA ID Number

TXR000070243

OMB#: 2050-0024; Expires 11/30/2011

10. Type of Regulated Waste Activity (at your site)
Mark "Yes" or "No" for all current activities (as of the date submitting the form); complete any additional boxes as instructed.

A. Hazardous Waste Activities; Complete all parts 1-7.

Y ☐ N ☒

1. Generator of Hazardous Waste

If "Yes", mark only one of the following - a, b, or c.

- ☐ a. LQG: Generates, in any calendar month, 1,000 kg/mo (2,200 lbs./mo.) or more of hazardous waste; or Generates, in any calendar month, or accumulates at any time, more than 1 kg/mo (2.2 lbs./mo) of acute hazardous waste; or Generates, in any calendar month, or accumulates at any time, more than 100 kg/mo (220 lbs./mo) of acute hazardous spill cleanup material.

- ☐ b. SQG: 100 to 1,000 kg/mo (220 - 2,200 lbs./mo) of non-acute hazardous waste.

- ☐ c. CESQG: Less than 100 kg/mo (220 lbs./mo) of non-acute hazardous waste.

If "Yes" above, indicate other generator activities.

Y ☐ N ☒

- d. Short-Term Generator (generate from a short-term or one-time event and not from on-going processes). If "Yes", provide an explanation in the Comments section.

Y ☐ N ☒

- e. United States Importer of Hazardous Waste

Y ☐ N ☒

- f. Mixed Waste (hazardous and radioactive) Generator

Y ☒ N ☐

2. Transporter of Hazardous Waste
If "Yes", mark all that apply.

- ☒ a. Transporter
☒ b. Transfer Facility (at your site)

Y ☐ N ☒

3. Treater, Storer, or Disposer of Hazardous Waste Note: A hazardous waste permit is required for these activities.

Y ☐ N ☒

4. Recycler of Hazardous Waste

Y ☐ N ☒

5. Exempt Boiler and/or Industrial Furnace
If "Yes", mark all that apply.

- ☐ a. Small Quantity On-site Burner Exemption
☐ b. Smelting, Melting, and Refining Furnace Exemption

Y ☐ N ☒

6. Underground Injection Control

Y ☐ N ☒

7. Receives Hazardous Waste from Off-site

B. Universal Waste Activities; Complete all parts 1-2.

Y ☒ N ☐

1. Large Quantity Handler of Universal Waste (you accumulate 5,000 kg or more) [refer to your State regulations to determine what is regulated]. Indicate types of universal waste managed at your site. If "Yes", mark all that apply.

- a. Batteries ☒
b. Pesticides ☒
c. Mercury containing equipment ☒
d. Lamps ☒
e. Other (specify) Paint related mat. ☒
f. Other (specify) _____ ☐
g. Other (specify) _____ ☐

Y ☐ N ☒

2. Destination Facility for Universal Waste

Note: A hazardous waste permit may be required for this activity.

C. Used Oil Activities; Complete all parts 1-4.

Y ☒ N ☐

1. Used Oil Transporter
If "Yes", mark all that apply.

- ☒ a. Transporter
☒ b. Transfer Facility (at your site)

Y ☐ N ☒

2. Used Oil Processor and/or Re-refiner
If "Yes", mark all that apply.

- ☐ a. Processor
☐ b. Re-refiner

Y ☐ N ☒

3. Off-Specification Used Oil Burner

Y ☐ N ☒

4. Used Oil Fuel Marketer
If "Yes", mark all that apply.

- ☐ a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
☐ b. Marketer Who First Claims the Used Oil Meets the Specifications

EPA ID Number

TXR 000070243

OMB#: 2050-0024; Expires 11/30/2011

D. Eligible Academic Entities with Laboratories—Notification for opting into or withdrawing from managing laboratory hazardous wastes pursuant to 40 CFR Part 262 Subpart K

- ❖ You must check with your State to determine if you are eligible to manage laboratory hazardous wastes pursuant to 40 CFR Part 262 Subpart K

- ☐ 1. Opting into or currently operating under 40 CFR Part 262 Subpart K for the management of hazardous wastes in laboratories
See the item-by-item instructions for definitions of types of eligible academic entities. Mark all that apply:
- ☐ a. College or University
- ☐ b. Teaching Hospital that is owned by or has a formal written affiliation agreement with a college or university
- ☐ c. Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university
- ☐ 2. Withdrawing from 40 CFR Part 262 Subpart K for the management of hazardous wastes in laboratories

11. Description of Hazardous Waste

- A. Waste Codes for Federally Regulated Hazardous Wastes.** Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more spaces are needed.

D001	D002	D003	D004	D005	D006	D007
D008	D009	D010	D011	D012	D013	D014
D015	D016	D017	D018	D019	D020...	
		(see attached for additional codes)				

- B. Waste Codes for State-Regulated (i.e., non-Federal) Hazardous Wastes.** Please list the waste codes of the State-Regulated hazardous wastes handled at your site. List them in the order they are presented in the regulations. Use an additional page if more spaces are needed.

EPA ID Number

T X R 0 0 0 0 7 0 2 4 3

OMB#: 2050-0024; Expires 11/30/2011

12. Notification of Hazardous Secondary Material (HSM) Activity

Y ☐ N ☒ Are you notifying under 40 CFR 260.42 that you will begin managing, are managing, or will stop managing hazardous secondary material under 40 CFR 261.2(a)(2)(ii), 40 CFR 261.4(a)(23), (24), or (25)?

If "Yes", you must fill out the Addendum to the Site Identification Form: Notification for Managing Hazardous Secondary Material.

13. Comments

14. Certification. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations. For the RCRA Hazardous Waste Part A Permit Application, all owner(s) and operator(s) must sign (see 40 CFR 270.10(b) and 270.11).

Signature of legal owner, operator, or an authorized representative

Name and Official Title (type or print)

Date Signed
(mm/dd/yyyy)*T. Conner*

Todd Conner, President

07/20/2010

Attachment for EPA Form 8700-12 Section 11.A

D021	D022	D023	D024	D025	D026	D027	D028	D029	D030	D031	D032
D033	D034	D035	D036	D037	D038	D039	D040	D041	D042	D043	F001
F002	F003	F004	F005	F006	F007	F008	F009	F010	F011	F012	F019
F020	F021	F022	F023	F024	F025	F026	F027	F028	F032	F034	F035
F037	F038	F039	P003	P004	P005	P006	P119	P012	P011	P013	P014
P017	P021	P127	P022	P095	P024	P029	P030	P031	P033	P016	P037
P050	P051	P097	P056	P057	P059	P063	P096	P060	P065	P066	P068
P064	P071	P190	P073	P074	P075	P076	P077	P078	P087	P088	P089
P034	P048	P092	P093	P098	P099	P201	P102	P104	P105	P106	P108
P110	P123	P120	P001	P121	P122	P205	U001	U034	U187	U005	U240
U112	U144	U214	U002	U003	U004	U006	U007	U008	U009	U011	U012
U136	U014	U015	U010	U280	U278	U364	U271	U157	U016	U017	U192
U018	U094	U049	U093	U181	U019	U038	U030	U035	U037	U221	U028
U169	U183	U021	U022	U197	U023	U085	U225	U128	U031	U159	U160
U053	U074	U136	U032	U372	U238	U097	U114	U062	U279	U367	U215
	U033	U156	U211	U038	U042	U044	U046	U047	U048	U050	U051
	U052	U055	U246	U056	U057	U130	U060	U061	U063	U069	U070
	U071	U072	U073	U075	U078	U079	U025	U027	U024	U081	U082
	U084	U086	U088	U089	U090	U092	U095	U098	U099	U101	U102
	U103	U105	U106	U107	U108	U109	U110	U041	U404	U067	U076
	U077	U184	U218	U359	U043	U210	U228	U113	U117	U115	U118
	U119	U120	U122	U123	U124	U125	U147	U213	U126	U127	U131
	U132	U133	U134	U135	U137	U140	U141	U142	U143	U145	U129
	U148	U149	U150	U151	U152	U029	U045	U153	U154	U155	U247
	U226	U158	U068	U080	U138	U161	U162	U164	U167	U168	U165
	U236	U166	U217	U170	U171	U185	U186	U188	U189	U190	U191
	U194	U193	U083	U196	U200	U201	U202	U203	U204	U205	U206
	U207	U208	U209	U219	U220	U223	U328	U353	U222	U408	U227
	U234	U248	U239	U249							

Waste Acceptance Procedures for Small Container

This procedure is for the Acceptance of Hazardous or Non-Hazardous Waste in a Small Container. Small containers are Boxes, Totes, Drums, or Buckets. This procedure is for Drivers, Dispatch, Warehouse Technicians, and Yard Technicians.

When Hazardous or Non-Hazardous waste arrives at the C4 facility either from C4 or UTS pickup, or customer delivered:

1. The person receiving the waste will perform a Paperwork Review by:
 - 1.1 Verify manifests or BOLs are accurately filled out
 - 1.2 Verify piece count matches shipping document
2. The person receiving the waste will Verify:
 - 2.1 That the containers are in good condition and can be transferred to the appropriate area
 - 2.2 All labels are accurate
 - 2.3 That all items being transferred are compatible with the existing load
3. If the waste is **Universal Waste** go to step 6.
4. Transfer the Waste containers from inbound truck to the outbound trailer
 - 4.1 Place copy of shipping document on a clip board (or folder) inside the corresponding out-bound trailer
 - 4.2 Place the original in the Disposal Mgr log-in box so the load can be accurately tracked
 - 4.3 Disposal Mgrs office logs the manifest and containers into our in-house Tracking log.
 - 4.4 Log records data such as: inbound date, manifest #, generator's name, C4 job #, waste stream name, TSDF approval #, quantity and type of containers, estimated weights, applicable waste codes, etc.
5. Once the trailer is full or we are approaching our storage time limit:
 - 5.1 Disposal Mgr coordinates w/ final TSDF on projected delivery schedule. Collect the Original shipping documents and provide copies to receiving facility for paperwork review.
 - 5.2 Driver confirms the load matches the shipping documents, ships the load (with the original shipping papers) to the final TSDF

Waste Acceptance Procedures for Small Container

5.3 Driver retains copies of "received" documents from the load delivery and returns them to the Disposal Mgr office for our log update

5.4 Go to step 11

Universal Waste

6. The Disposal Managers office will log the Universal Waste in the Universal Waste Tracking Log
 - 6.1 For containers that are not added to existing universal waste consolidation drums, the Disposal Managers office will provide a label with a C4 unique number and accumulation start date for a new container.
7. The Disposal Manager Office must be informed of the Consolidation of Universal Waste containers (i.e.: Paint can consolidation) because this requires an update in the Universal Waste Log
8. All Universal Waste becomes part of the daily warehouse inspection to verify the containers are still properly labeled and are in good condition
9. Universal Waste will be stored in the proper Universal Waste area until it is shipped to the final TSDF
10. Per the conditions of our Universal Waste Handling Permit from the TCEQ, at no time will any Universal Waste be kept for over 1 year.

Paper Work

11. All paper work is to be turned into the dispatch office after waste is delivered to its final Location.
 - 11.1 Dispatch will make sure that all paperwork is accounted for and is properly completed.
 - 11.2 Dispatch will then give the paper work to Customer Service for filing.

IHW020

*** TEXAS COMMISSION ON ENVIRONMENTAL QUALITY ***
Notice of Registration
Industrial and Hazardous Waste

Page: 1
Date: 07/09/10

87955 C4 Environmental Services LLC

Solid Waste Registration Number: 87955 EPA Id: TXR000070243

Company Name: C4 Environmental Services LLC
Site Name: C4 Environmental Services
Site Location: 9000 Liberty Rd, Houston, TX
Primary Contact: Conner, Todd
Mailing Address: 9000 Liberty Rd
Houston, TX 77028-5713

Region: 12
County: 101 Harris
Land Type: Private
Title: President

Initial Registration Date: 05/18/2006
Last Amendment Date: 05/18/2009
Last Date NOR Computer update: 05/04/2010
Phone: 713-670-0200
Site Street Address: 9000 Liberty Rd
Houston, TX 77028-5713

Registration Status: Active
Registration Type: Transporter
Generator Type: Industrial
Transporter Type: For hire
Transport Wst Class: 1 2 H

Hazardous Waste Generation Status: Univ Waste Only

Business Description: Environmental consulting, waste management & transportation

NAICS Code: 541620 Environmental Consulting Services
Tax Identification #: 32018799307
Handler Status:

Operator Information

Name: C4 Environmental Services LLC
Phone: 713-670-0200
Address: 9000 Liberty Rd
Houston, TX, 77028-5713

Owner Information

Name: C4 Environmental Services LLC
Phone: 713-670-0200
Address: 9000 Liberty Rd
Houston, TX, 77028-5713

Billing Contact:
Billing Address:

Title: Phone:

As of 05/18/2009 - the next unassigned sequence number for WASTES is 0001 and
the next unassigned sequence number for UNITS is 001.

RCRA Site Detail

Report run on: August 7, 2014 - 11:20 AM

Version 5.0

User Selection Criteria

Handler EPA ID: TXR000070243

History: All records

BR Cycles: Show all

Include Notes: No

Results

Data meeting the criteria you selected follows.

Total Pages: 7

Report Description

The RCRA Site Detail report provides "all available details" from the handler module and summarized information from the waste activity monitoring module for one RCRA site. The report integrates National Biennial RCRA Hazardous Waste Report data with Site Identification data.

Details reported about the RCRA site include basic handler module information; the standard suite of universes; information about each source record received for the facility, including basic information, location and mailing address, source record and permit contact person (including historical records), list of NAICS codes, complete list of regulated waste activities; and summarized National Biennial RCRA Hazardous Waste Report information by reporting cycle year, including quantity totals (generated, managed, shipped, received), and top ten GM forms by quantity generated. Top ten GM form list shows reported waste description, quantities, onsite and offsite system types, and EPA and State waste codes.

Information listed for the RCRA site can be limited by latest historical information and most recent BR cycle.

Data is sorted by the most recent Received Date. If more than one record has the same Received Date, the data is sorted by Source Type (I-Implementer; N-Notification, B-Biennial Report with Subsequent Notification, R-Biennial Report, A-Part A, T-Temporary, E-Emergency).

Report Information

Name: h_site_detail.rdf
Developed by: EPA Headquarters, Office of Resource Conservation and Recovery
Deployed: November 2002
Last Revised: September 2012
Contact: rcrainfo.help@epa.gov
Tables Used: hbasic, hreport_univ5, gis4, gis_lat_long4, lu_generator_status, hother_id5, hpart_a5, hhandler5, lu_generator_status, lu_country, howner_operator5, hnaics5, lu_naics, hstate_activity5, lu_state_activity, hother_permit5, lu_other_permit, huniversal_waste5, lu_universal_waste, hwaste_code5, bgm_basic, bgm_onsite_treatment, bgm_offsite_shipment, bgm_waste_code, lu_management_method, lu_state, hid_groups, hhsm_basic5, hhsm_activity5, hhsm_waste_code5

NOTE: Some data is suppressed if it is null or blank. See documentation in RCRAInfo Help for details.

RCRA Site Detail

Report run on: August 7, 2014 - 11:20 AM

Page 2

List of Hazardous Waste Code Descriptions

Please run the lookup table report for LU_WASTE_CODES for description of federal and state waste codes in this report.

List of Handler Universe Abbreviations

Active	Active Status -- Indicates that the facility could be subject to the federal RCRA, Subtitle C or a state's authorized hazardous waste program. This definition has no legally enforceable or binding determination about the status of a particular site or the obligations of an owner or operator.
Commercial TSDF	Commercial TSDF -- Indicates that the facility is a commercial operator of treating, storing and disposing of hazardous waste.
EI Indicator (HE/GW)	Environmental Indicator (Human Exposure/Groundwater Release) -- Indicates that the facility has controls in place for Environmental Indicators. HE - Human Exposures ('+' indicates the exposure exists and is under control; '-' indicates the exposure exists and is not under control; 'N' indicates the exposure does not exist). GW - Groundwater Release ('+' indicates the exposure exists and is under control; '-' indicates the exposure exists and is not under control; 'N' indicates the exposure does not exist).
Federal Generator	Federal Generator Status -- Indicates the regulatory status of the site as determined by the quantity and/or toxicity of hazardous wastes generated, stored or accumulated over a specified period of time.
HSM	HSM -- Indicates that the facility manages hazardous secondary material(s) (e.g. spent material, by-product or sludge) that when discarded, would be identified as hazardous waste.
IC In Place	Institutional Controls in Place -- Indicates that the facility has Institutional Controls in place ('Y' indicates that the facility is in the universe).
Importer	Importer -- Indicates that the facility imports hazardous waste into the United States from a foreign country.
Mixed Waste Generator	Mixed Waste Generator -- Indicates that the facility is a generator or TSDF that handles waste mixed with nuclear source, special nuclear or by-product material.
Operating TSDF	Operating TSDF -- Indicates that the facility is a Treatment, Storage or Disposal facility subject to any type of enforcement. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment).
Short Term Generator	Short Term Generator -- Indicates that the facility is a short term or one time event generator and not generating from ongoing processes.
State Generator	State Generator Status -- Indicates the regulatory status of the site in view of implementing the State's "broader in scope" or "more stringent than" rules. Although an implementing State might use terms that differ for their generators these terms would be translated to match the Federal regulatory term.
Transporter	Transporter -- Indicates that the facility is engaged in the off-site transportation of hazardous waste. ('Y' indicates that the facility is in this universe).
Subpart K/College	Subpart K/College or University -- Indicates facility has opted into the subpart k laboratory rule as a college or university.
Subpart K/Hospital	Subpart K/Teaching Hospital -- Indicates facility has opted into the subpart k laboratory rule as a teaching hospital.
Subpart K/Non-profit	Subpart K/Non-profit Research Institute -- Indicates facility has opted into the subpart k laboratory rule as a non-profit research institute.
Subpart K/Withdrawal	Subpart K/Withdrawal from Rule -- Indicates facility has withdrawn from the subpart k laboratory rule.

RCRA Site Detail

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*** WARNING *** Sensitive information may be displayed on this report. *** WARNING ***

C4 ENVIRONMENTAL SERVICES LLC

TXR000070243

EPA Region:06 Extract:Y County: HARRIS

State District: 12

Universes	Federal Generator:	N	Transporter:	Y	Operating TSDF:	-----	Active:	Y
	State Generator:	N	Importer:	N	Commercial:	N	EI Indicator (HE / GW):	N / N
	Short Term Generator:	N	Mixed Waste Generator:	N	HSM:	N	IC In Place:	N
	Subpart K/College:	N	Subpart K/Hospital:	N	Subpart K/Non-profit:	N	Subpart K/Withdrawal:	N

Latitude/Longitude Measure - Owner: Seq #:

Coordinates:

Receive Date: 09/17/2010 Source Type: Notification

Seq. Number: 4

Location 9000 STE A LIBERTY RD
Address: HOUSTON, TX 77028

Mailing 9000 STE A LIBERTY RD
Address: HOUSTON, TX 77028
UNITED STATES

Contact Person BRIEN T. CONNER
For Source PRESIDENT
Information 713-670-0200
TCONNER@C4ENV.COM
Fax: 713-670-0404

9000 STE A LIBERTY RD
HOUSTON, TX 77028
UNITED STATES

Owner (current) C4 LIBERTY HOLDINGS, LLC From: 12/31/2008 To:	9000 STE A LIBERTY RD HOUSTON, TX 77028-5713 HOUSTON	Type: Private Phone:
Owner (current) C4 ENVIRONMENTAL SERVICES LLC From: 09/10/2009 To:	PO BOX 692375 HOUSTON, TX 77269 HOUSTON	Type: Private Phone: 713-670-0200
Operator (current) C4 ENVIRONMENTAL SERVICES LLC From: 05/18/2009 To:	PO BOX 692375 HOUSTON, TX 77269 HOUSTON	Type: Private Phone: 713-670-0200

Land Type: Private Non Notifier: No TSD Date: Accessibility:

NAICS Codes: 54162 ENVIRONMENTAL CONSULTING SERVICES

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Not a Generator; State: TX-N No separately defined State status

Other Hazardous Waste Generator Activities

Short Term Generator:	No
Importer Activity:	No
Mixed Waste Generator:	No
Transporter Activity:	Yes
Transfer Facility:	Yes
TSD Activity:	No
Recycler Activity:	No
Off-Site Receipt:	No

Exempt Boiler and/or Industrial Furnace

Small Quantity Onsite Burner Exemption:	No
Smelting, Melting, Refining Furnace Exemption:	No

Underground Injection Control: No

Destination Facility for Universal Waste: No

Used Oil Activities

Used Oil Transporter Activity	Off-Specification Used Oil Burner:	No
Transporter:	Yes	
Transfer Facility:	Yes	
Used Oil Processor and/or Re-refiner Activity	Used Oil Fuel Marketer Activity	
	Marketer who directs shipment off-specification used oil to off-specification used oil burner:	No
Processor:	No	
Refiner:	No	
	Marketer who first claims the used oil meets the specifications:	No

Subpart K:

College/University:	No	Non-profit Research Institute:	No
Teaching Hospital:	No	Withdrawal:	No

Universal Waste Activities:

Description	Generated	Accumulated/Managed
Batteries		Y
Lamps		Y
Pesticides		Y
Mercury containing equipment		Y
Paint and Paint Related Materials	N	Y

Description of Hazardous Wastes (as reported on Site Identification Form)

EPA Waste Codes: D001 D002 D003 D004 D005 D006 D007 D008 D009 D010 D011 D012 D013 D014 D015 D016 D017 D018 D019 D020 D021 D022 D023 D024 D025 D026 D027 D028 D029 D030 D031 D032 D033 D034 D035 D036 D037 D038 D039 D040 D041 D042 D043 F001 F002 F003 F004 F005 F006 F007 F008 F009 F010 F011 F012 F019 F020 F021 F022 F023 F024 F025 F026 F027 F028 F032 F034 F035 F037 F038 F039 P001 P003 P004 P005 P006 P011 P012 P013 P014 P016 P017 P021 P022 P024 P029 P030 P031 P033 P037 P050 P051 P056 P057 P059 P060 P063 P064 P065 P066 P068 P071 P073 P074 P075 P076 P077 P078 P087 P088 P089 P092 P093 P095 P096 P097 P098 P099 P102 P104 P105 P106 P108 P110 P119 P120 P121 P122 P123 P127 P190 P201 P205 U001 U002 U003

RCRA Site Detail

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*** WARNING *** Sensitive information may be displayed on this report. *** WARNING ***

Receive Date: 09/17/2010	Source Type: Notification	Seq. Number: 4
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Description of Hazardous Wastes (as reported on Site Identification Form)

U004 U005 U006 U007 U008 U009 U010 U011 U012 U014 U015 U016 U017 U018 U019 U020 U021 U022 U023 U024 U025 U026 U027
U028 U029 U030 U031 U032 U033 U034 U035 U036 U037 U038 U039 U041 U042 U043 U044 U045 U046 U047 U048 U049 U050 U051
U052 U053 U055 U056 U057 U058 U059 U060 U061 U062 U063 U064 U066 U067 U068 U069 U070 U071 U072 U073 U074 U075 U076
U077 U078 U079 U080 U081 U082 U083 U084 U085 U086 U087 U088 U089 U090 U091 U092 U093 U094 U095 U096 U097 U098 U099
U101 U102 U103 U105 U106 U107 U108 U109 U110 U111 U112 U113 U114 U115 U116 U117 U118 U119 U120 U121 U122 U123 U124
U125 U126 U127 U128 U129 U130 U131 U132 U133 U134 U135 U136 U137 U138 U140 U141 U142 U143 U144 U145 U146 U147 U148
U149 U150 U151 U152 U153 U154 U155 U156 U157 U158 U159 U160 U161 U162 U163 U164 U165 U166 U167 U168 U169 U170 U171
U172 U173 U174 U176 U177 U178 U179 U180 U181 U182 U183 U184 U185 U186 U187 U188 U189 U190 U191 U192 U193 U194 U196
U197 U200 U201 U202 U203 U204 U205 U206 U207 U208 U209 U210 U211 U213 U214 U215 U216 U217 U218 U219 U220 U221 U222
U223 U225 U226 U227 U228 U234 U235 U236 U237 U238 U239 U240 U243 U244 U246 U247 U248 U249 U271 U277 U278 U279 U280
U328 U353 U359 U364 U365 U366 U367 U372 U373 U375 U376 U377 U378 U379 U381 U382 U383 U384 U385 U386 U387 U389 U390
U391 U392 U393 U394 U395 U396 U400 U401 U402 U403 U404 U407 U408 U409 U410 U411

RCRA Site Detail

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*** WARNING *** Sensitive information may be displayed on this report. *** WARNING ***

Receive Date: 09/10/2009	Source Type: Notification	Seq. Number: 3
Location 9000 LIBERTY RD Address: HOUSTON, TX 77028		Mailing Address: PO BOX 692375 HOUSTON, TX 77269 UNITED STATES

Contact Person TODD CONNER
For Source Information 713-670-0200
 PO BOX 692375
 HOUSTON, TX 77269
 UNITED STATES

Owner (current) PO BOX 692375 Type: Private
 C4 ENVIRONMENTAL SERVICES LLC HOUSTON, TX 77269 Phone: 713-670-0200
 From: 09/10/2009 To: HOUSTON

Operator (current) PO BOX 692375 Type: Private
 C4 ENVIRONMENTAL SERVICES LLC HOUSTON, TX 77269 Phone: 713-670-0200
 From: 09/10/2009 To: HOUSTON

Land Type: Private **Non Notifier:** No **TSD Date:** **Accessibility:**

NAICS Codes: 54162 ENVIRONMENTAL CONSULTING SERVICES

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Not a Generator; State: TX-N No separately defined State status

Other Hazardous Waste Generator Activities

Short Term Generator:	No
Importer Activity:	No
Mixed Waste Generator:	No
Transporter Activity:	Yes
Transfer Facility:	No
TSD Activity:	No
Recycler Activity:	No
Off-Site Receipt:	No

Exempt Boiler and/or Industrial Furnace

Small Quantity Onsite Burner Exemption:	No
Smelting, Melting, Refining Furnace Exemption:	No

Underground Injection Control: No

Destination Facility for Universal Waste: No

Used Oil Activities

Used Oil Transporter Activity	Off-Specification Used Oil Burner:	No
Transporter:	No	
Transfer Facility:	No	
Used Oil Processor and/or Re-refiner Activity	Used Oil Fuel Marketer Activity	
	Marketer who directs shipment off-specification used oil to off-specification used oil burner:	No
Processor:	No	
Refiner:	No	
	Marketer who first claims the used oil meets the specifications:	No

Subpart K

College/University:	No	Non-profit Research Institute:	No
Teaching Hospital:	No	Withdrawal:	No

RCRA Site Detail

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*** WARNING *** Sensitive information may be displayed on this report. *** WARNING ***

Receive Date: 09/03/2009	Source Type: Notification	Seq. Number: 2
Location 9000 LIBERTY RD Address: HOUSTON, TX 77028		Mailing Address: PO BOX 692375 HOUSTON, TX 77269 UNITED STATES

Contact Person TODD CONNER
For Source Information 713-670-0200
 PO BOX 692375
 HOUSTON, TX 77269
 UNITED STATES

Owner (current) C4 ENVIRONMENTAL SERVICES LLC
From: 09/03/2009 **To:** PO BOX 692375
 HOUSTON, TX 77269
 HOUSTON
Type: Private
Phone: 713-670-0200

Operator (current) C4 ENVIRONMENTAL SERVICES LLC
From: 09/03/2009 **To:** PO BOX 692375
 HOUSTON, TX 77269
 HOUSTON
Type: Private
Phone: 713-670-0200

Land Type: Private **Non Notifier:** No **TSD Date:** **Accessibility:**

NAICS Codes: 54162 ENVIRONMENTAL CONSULTING SERVICES

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Not a Generator; **State:** TX-N No separately defined State status

Other Hazardous Waste Generator Activities

Short Term Generator:	No
Importer Activity:	No
Mixed Waste Generator:	No
Transporter Activity:	Yes
Transfer Facility:	No
TSD Activity:	No
Recycler Activity:	No
Off-Site Receipt:	No
Exempt Boiler and/or Industrial Furnace	
Small Quantity Onsite Burner Exemption:	No
Smelting, Melting, Refining Furnace Exemption:	No
Underground Injection Control:	No
Destination Facility for Universal Waste:	No

Used Oil Activities

Used Oil Transporter Activity	Off-Specification Used Oil Burner:	No
Transporter:	No	
Transfer Facility:	No	
Used Oil Processor and/or Re-refiner Activity	Used Oil Fuel Marketer Activity	
Processor:	No	
Refiner:	No	
	Marketer who directs shipment off-specification used oil to off-specification used oil burner:	No
	Marketer who first claims the used oil meets the specifications:	No
Subpart K		
College/University:	No	Non-profit Research Institute: No
Teaching Hospital:	No	Withdrawal: No

RCRA Site Detail

Report run on: August 7, 2014 - 11:20 AM

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*** WARNING *** Sensitive information may be displayed on this report. *** WARNING ***

Receive Date: 06/06/2006	Source Type: Notification	Seq. Number: 1
Location 7200 S LAKE HOUSTON PKWY Address: HOUSTON, TX 77049		Mailing PO BOX 692375 Address: HOUSTON, TX 77269 UNITED STATES

Contact Person TODD CONNER
For Source 281-459-9992
Information PO BOX 692375
 HOUSTON, TX 77269
 UNITED STATES

Owner (current) C4 ENVIRONMENTAL SERVICES LLC
From: 05/18/2006 **To:** PO BOX 692375
 HOUSTON, TX 77269
 HOUSTON
Type: Private
Phone: 281-459-9992

Land Type: Private **Non Notifier:** No **TSD Date:** **Accessibility:**

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Not a Generator; State: TX-N No separately defined State status

Other Hazardous Waste Generator Activities

Short Term Generator:	No
Importer Activity:	No
Mixed Waste Generator:	No
Transporter Activity:	Yes
Transfer Facility:	No
TSD Activity:	No
Recycler Activity:	No
Off-Site Receipt:	No

Exempt Boiler and/or Industrial Furnace

Small Quantity Onsite Burner Exemption:	No
Smelting, Melting, Refining Furnace Exemption:	No

Underground Injection Control:	No
Destination Facility for Universal Waste:	No

Used Oil Activities

Used Oil Transporter Activity	Off-Specification Used Oil Burner:	No
Transporter:	No	
Transfer Facility:	No	
Used Oil Processor and/or Re-refiner Activity	Used Oil Fuel Marketer Activity	
Processor:	Marketer who directs shipment off-specification used oil to off-specification used oil burner:	No
Refiner:	Marketer who first claims the used oil meets the specifications:	No

Subpart K

College/University:	No	Non-profit Research Institute:	No
Teaching Hospital:	No	Withdrawal:	No

* End of Report *

SEND COMPLETED FORM TO: The Appropriate State or EPA Regional Office.	United States Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION FORM		
1. Reason for Submittal (See instructions on page 13.) MARK ALL BOX(ES) THAT APPLY	Reason for Submittal: <input checked="" type="checkbox"/> To provide Initial Notification of Regulated Waste Activity (to obtain an EPA ID Number for hazardous waste, universal waste, or used oil activities) <input type="checkbox"/> To provide Subsequent Notification of Regulated Waste Activity (to update site identification information) <input type="checkbox"/> As a component of a First RCRA Hazardous Waste Part A Permit Application <input type="checkbox"/> As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment # _____) <input type="checkbox"/> As a component of the Hazardous Waste Report		
2. Site EPA ID Number (page 14)	EPA ID Number: _____		
3. Site Name (page 14)	Name: <u>C4 Environmental Services LLC</u>		
4. Site Location Information (page 14)	Street Address: <u>7200 S. Lake Houston Parkway</u>		
	City, Town, or Village: <u>Houston</u>	State: <u>Texas</u>	
	County Name: <u>Harris</u>	Zip Code: <u>77049</u>	
5. Site Land Type (page 14)	Site Land Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		
6. North American Industry Classification System (NAICS) Code(s) for the Site (page 14)	A. <u>1541162</u>	B. _____	
	C. _____	D. _____	
7. Site Mailing Address (page 15)	Street or P. O. Box: <u>P.O. Box 692375</u>		
	City, Town, or Village: <u>Houston, Texas</u>		
	State: <u>Texas</u>		
	Country: <u>USA</u>	Zip Code: <u>77269-2375</u>	
8. Site Contact Person (page 15)	First Name: <u>Brien</u>	MI: <u>T</u>	Last Name: <u>Conner</u>
	Phone Number: <u>(281) 459-9992</u> Extension: _____		Email address: <u>tconner@c4env.com</u>
9. Operator and Legal Owner of the Site (pages 15 and 16)	A. Name of Site's Operator: <u>C4 Environmental Services LLC</u>		Date Became Operator (mm/dd/yyyy): <u>05-18-06</u>
	Operator Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		
	B. Name of Site's Legal Owner: <u>Mr. Olin Wooten</u>		Date Became Owner (mm/dd/yyyy): <u>~1995</u>
	Owner Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		

9. Legal Owner (Continued) Address	Street or P. O. Box: <u>340 Meeachin Landing Rd.</u>	
	City, Town, or Village <u>Hazlehurst</u>	
	State: <u>Georgia</u>	
	Country: <u>USA</u>	Zip Code: <u>31539</u>

10. Type of Regulated Waste Activity

Mark "Yes" or "No" for all activities; complete any additional boxes as instructed. (See instructions on pages 17 to 20.)

A. Hazardous Waste Activities

Complete all parts for 1 through 6.

Y ☐ N ☒ 1. Generator of Hazardous Waste

If "Yes", choose only one of the following - a, b, or c.

- ☐ a. LQG: Greater than 1,000 kg/mo (2,200 lbs./mo.)
of non-acute hazardous waste; or
- ☐ b. SQG: 100 to 1,000 kg/mo (220 - 2,200 lbs./mo.)
of non-acute hazardous waste; or
- ☐ c. CESQG: Less than 100 kg/mo (220 lbs./mo.)
of non-acute hazardous waste

In addition, indicate other generator activities.

Y ☐ N ☒ d. United States Importer of Hazardous WasteY ☐ N ☒ e. Mixed Waste (hazardous and radioactive) GeneratorY ☒ N ☐ 2. Transporter of Hazardous WasteY ☐ N ☒ 3. Treater, Storer, or Disposer ofHazardous Waste (at your site) Note:
A hazardous waste permit is required for
this activity.Y ☐ N ☒ 4. Recycler of Hazardous Waste (at your
site)Y ☐ N ☒ 5. Exempt Boiler and/or Industrial
Furnace

If "Yes", mark each that applies.

- ☐ a. Small Quantity On-site Burner
Exemption
- ☐ b. Smelting, Melting, and Refining
Furnace Exemption

Y ☐ N ☒ 6. Underground Injection Control

B. Universal Waste Activities

Y ☐ N ☒ 1. Large Quantity Handler of Universal Waste (accumulate
5,000 kg or more) [refer to your State regulations to
determine what is regulated]. Indicate types of universal
waste generated and/or accumulated at your site. If "Yes",
mark all boxes that apply:

	Generate	Accumulate
a. Batteries	<input type="checkbox"/>	<input type="checkbox"/>
b. Pesticides	<input type="checkbox"/>	<input type="checkbox"/>
c. Thermostats	<input type="checkbox"/>	<input type="checkbox"/>
d. Lamps	<input type="checkbox"/>	<input type="checkbox"/>
e. Other (specify) _____	<input type="checkbox"/>	<input type="checkbox"/>
f. Other (specify) _____	<input type="checkbox"/>	<input type="checkbox"/>
g. Other (specify) _____	<input type="checkbox"/>	<input type="checkbox"/>

Y ☐ N ☒ 2. Destination Facility for Universal Waste

Note: A hazardous waste permit may be required for this activity.

C. Used Oil Activities

Mark all boxes that apply.

Y ☐ N ☒ 1. Used Oil Transporter

If "Yes", mark each that applies.

- ☐ a. Transporter
- ☐ b. Transfer Facility

Y ☐ N ☒ 2. Used Oil Processor and/or Re-refiner

If "Yes", mark each that applies.

- ☐ a. Processor
- ☐ b. Re-refiner

Y ☐ N ☒ 3. Off-Specification Used Oil BurnerY ☐ N ☒ 4. Used Oil Fuel Marketer

If "Yes", mark each that applies.

- ☐ a. Marketer Who Directs Shipment of
Off-Specification Used Oil to
Off-Specification Used Oil Burner
- ☐ b. Marketer Who First Claims the
Used Oil Meets the Specifications

A. Waste Codes for Federally Regulated Hazardous Wastes. Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more spaces are needed.

NA						

NA						

12. Comments (see instructions):

Signature of operator, owner, or an authorized representative	Name and Official Title (type or print)	Date Signed (mm/dd/yyyy)
T. Conner	Todd Conner, President C4 Env Srv.	05/18/06

TCEQ Core Data Form

TCEQ Use Only

If you have questions on how to fill out this form or about our Central Registry, please contact us at 512-239-5175.

Individuals are entitled to request and review their personal information that the agency gathers on its forms. They may also have any errors in their information corrected. To review such information, contact us at 512-239-3282.

SECTION I: General Information

1. Reason for Submission <i>Example: new wastewater permit; IHW registration; change in customer information; etc.</i> application for EPA & state registration numbers	
2. Attachments <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Describe Any Attachments: (ex: Title V Application, Waste Transporter Application, etc.)
3. Customer Reference Number-if issued CN 603047242 (9 digits)	4. Regulated Entity Reference Number-if issued RN 104967724 (9 digits)

SECTION II: Customer Information

5. Customer Role (Proposed or Actual) – As It Relates to the Regulated Entity Listed on This Form Please check <u>one</u> of the following: <input type="checkbox"/> Owner <input type="checkbox"/> Operator <input checked="" type="checkbox"/> Owner and Operator <input type="checkbox"/> Occupational Licensee <input type="checkbox"/> Volunteer Cleanup Applicant <input type="checkbox"/> Other: _____ TCEQ Use Only <input type="checkbox"/> Superfund <input type="checkbox"/> PST <input type="checkbox"/> Respondent			
6. General Customer Information <input checked="" type="checkbox"/> New Customer <input type="checkbox"/> Change to Customer Information <input type="checkbox"/> Change in Regulated Entity Ownership <input type="checkbox"/> No Change* *If "No Change" and Section I is complete, skip to Section III - Regulated Entity Information.			
7. Type of Customer: <input type="checkbox"/> Individual <input type="checkbox"/> Sole Proprietorship - D.B.A. <input type="checkbox"/> Partnership <input checked="" type="checkbox"/> Corporation LLC <input type="checkbox"/> Federal Government <input type="checkbox"/> State Government <input type="checkbox"/> County Government <input type="checkbox"/> City Government <input type="checkbox"/> Other Government _____ <input type="checkbox"/> Other _____			
8. Customer Name (If an individual, please print last name first) <i>If new name, enter previous name:</i> C4 Environmental Services, LLC			
9. Mailing Address: P.O. Box 692375 Houston TX 77269 - 2375 City State ZIP ZIP + 4			
10. Country Mailing Information if outside USA USA		11. E-Mail Address if applicable connor@c4env.com	
12. Telephone Number (281) 459-9992		13. Extension or Code	
14. Fax Number if applicable (281) 459-9960			
15. Federal Tax ID (9 digits) 84-1709710		16. State Franchise Tax ID Number if applicable	
17. DUNS Number if applicable (9 digits)			
18. Number of Employees <input checked="" type="checkbox"/> 0-20 <input type="checkbox"/> 21-100 <input type="checkbox"/> 101-250 <input type="checkbox"/> 251-500 <input type="checkbox"/> 501 and higher		19. Independently Owned and Operated? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	

SECTION III: Regulated Entity Information

20. General Regulated Entity Information <input checked="" type="checkbox"/> New Regulated Entity <input type="checkbox"/> Change to Regulated Entity Information <input type="checkbox"/> No Change* *If "No Change" and Section I is complete, skip to Section IV - Preparer Information.	
21. Regulated Entity Name (If an individual, please print last name first) C4 Environmental Services, LLC	

22. Street Address: <u>7200 S. Lake Houston Parkway</u>			
(No P.O. Boxes) <u>Houston</u>		<u>TX</u>	<u>77049</u>
City	State	ZIP	ZIP + 4
23. Mailing Address: <u>P.O. Box 692375</u>			
<u>Houston</u>		<u>TX</u>	<u>77269 - 2375</u>
City	State	ZIP	ZIP + 4
24. E-Mail Address: <u>tconner@c4env.com</u>			
25. Telephone Number <u>(281) 459-9992</u>		26. Extension or Code	27. Fax Number if applicable <u>(281) 459-9960</u>
28. Primary SIC Code (4 digits) <u>8999</u>	29. Secondary SIC Code (4 digits)	30. Primary NAICS Code (5 or 6 digits) <u>54162</u>	31. Secondary NAICS Code (5 or 6 digits)
32. What is the Primary Business of this entity? (Please do not repeat the SIC or NAICS description.) <u>environmental consulting, waste management & transportation</u>			
Questions 33 - 37 address geographic location. Please refer to the instructions for applicability.			
33. County: <u>Harris</u>			
34. Description of Physical Location <u>1.5 acre yard with office located @ 7200 S. Lake Houston Pkwy Houston, TX 77049</u>			
35. Nearest City <u>Houston</u>		State <u>TX</u>	Nearest ZIP <u>77049</u>
36. Latitude (N)		37. Longitude (W)	
Degrees	Minutes	Degrees	Minutes
38. TCEQ Programs In Which This Regulated Entity Participates Not all programs have been listed. Please add to this list as needed. If you don't know or are unsure, please mark "unknown."			
<input type="checkbox"/> Animal Feeding Operation	<input type="checkbox"/> Petroleum Storage Tank	<input type="checkbox"/> Water Rights	
<input type="checkbox"/> Title V - Air	<input type="checkbox"/> Wastewater Permit	<input type="checkbox"/>	
<input checked="" type="checkbox"/> Industrial & Hazardous Waste	<input type="checkbox"/> Water Districts	<input type="checkbox"/>	
<input type="checkbox"/> Municipal Solid Waste	<input type="checkbox"/> Water Utilities	<input type="checkbox"/> Unknown	
<input type="checkbox"/> New Source Review - Air	<input type="checkbox"/> Licensing - TYPE(s)		

SECTION IV: Preparer Information

39. Name <u>Todd Conner</u>		40. Title <u>President C4</u>
41. Telephone Number <u>(281) 459-9992</u>	42. Extension or Code	43. Fax Number if applicable <u>(281) 459-9960</u>
44. E-Mail Address: <u>tconner@c4env.com</u>		

TCEQ Use Only
IHW _____ CO _____

Notification For Hazardous or Industrial Waste Management

Please print or type. Definitions and codes can be found in the Hazardous or Industrial Waste Form Instructions. Changes not related to Waste Streams or Waste Management Units must be accompanied by TCEQ Core Data Form (TCEQ 10400).

Part I. General Registration Information									
Section A. Notification Type and Registration Numbers If this is an Initial Notification, leave registration numbers blank. If updating existing Notice of Registration, provide current registration numbers.									
1. Notification type (check one): <input checked="" type="checkbox"/> Initial <input type="checkbox"/> Update									
2. Solid Waste Registration Number: _____	3. EPA Identification Number: _____								
4. Customer Reference Number: CN _____	5. Regulated Entity Number: RN _____								
Section B. Company Information									
1. Company Name: <u>C4 Environmental Services LLC</u>									
2. Site Name: <u>7200 S. Lake Houston Pkwy Houston, TX 77049</u>									
3. Registration Type (check all that apply): <input type="checkbox"/> Generator <input type="checkbox"/> Receiver <input checked="" type="checkbox"/> Transporter <input type="checkbox"/> Recycler									
4. Contact Information: <u>Todd Conner, Operations Mgr.</u> <small>(First Name, Last Name, Title)</small>									
Telephone Number: <u>(281) 459-9992</u> Fax Number: <u>(281) 459-9960</u> Email: <u>tconner@c4env.com</u>									
5. Waste Handler Status (check all that apply): <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Permitted TSD <input type="checkbox"/> Interim TSD <input type="checkbox"/> Recycler									
Section C. Generator Information									
If your facility does not fit the definition of a "Generator" skip to Section D									
1. Generator Type (check all that apply): <input type="checkbox"/> Industrial <input type="checkbox"/> Non-industrial <input type="checkbox"/> Railroad Commission									
2. Hazardous Waste Generation Status (check one):	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 25%; padding: 5px; vertical-align: top;"> <input type="checkbox"/> Large Quantity Generator (LQG) </td> <td style="padding: 5px;"> ♦ 2,200 pounds (1,000 kilograms) or more of hazardous waste and/or ♦ 2.2 pounds (1 kilogram) or more of acutely hazardous waste </td> </tr> <tr> <td style="padding: 5px; vertical-align: top;"> <input type="checkbox"/> Small Quantity Generator (SQG) </td> <td style="padding: 5px;"> ♦ between 220 and 2,200 pounds (100 and 1,000 kilograms) of hazardous waste and ♦ less than 2.2 pounds (1 kilogram) of acutely hazardous waste </td> </tr> <tr> <td style="padding: 5px; vertical-align: top;"> <input type="checkbox"/> Industrial Conditionally Exempt Small Quantity Generator (CESQG) </td> <td style="padding: 5px;"> ♦ 220 pounds (100 kilograms) or less of hazardous waste and ♦ less than 2.2 pounds (1 kilogram) of acutely hazardous waste and ♦ 220 pounds (100 kilograms) or more of industrial Class 1 waste </td> </tr> <tr> <td style="padding: 5px; vertical-align: top;"> <input type="checkbox"/> Universal Waste Only </td> <td style="padding: 5px;"> ♦ All hazardous waste generated is classified as Universal Waste and no reportable Class 1 waste is generated at the site. </td> </tr> </table>	<input type="checkbox"/> Large Quantity Generator (LQG)	♦ 2,200 pounds (1,000 kilograms) or more of hazardous waste and/or ♦ 2.2 pounds (1 kilogram) or more of acutely hazardous waste	<input type="checkbox"/> Small Quantity Generator (SQG)	♦ between 220 and 2,200 pounds (100 and 1,000 kilograms) of hazardous waste and ♦ less than 2.2 pounds (1 kilogram) of acutely hazardous waste	<input type="checkbox"/> Industrial Conditionally Exempt Small Quantity Generator (CESQG)	♦ 220 pounds (100 kilograms) or less of hazardous waste and ♦ less than 2.2 pounds (1 kilogram) of acutely hazardous waste and ♦ 220 pounds (100 kilograms) or more of industrial Class 1 waste	<input type="checkbox"/> Universal Waste Only	♦ All hazardous waste generated is classified as Universal Waste and no reportable Class 1 waste is generated at the site.
<input type="checkbox"/> Large Quantity Generator (LQG)	♦ 2,200 pounds (1,000 kilograms) or more of hazardous waste and/or ♦ 2.2 pounds (1 kilogram) or more of acutely hazardous waste								
<input type="checkbox"/> Small Quantity Generator (SQG)	♦ between 220 and 2,200 pounds (100 and 1,000 kilograms) of hazardous waste and ♦ less than 2.2 pounds (1 kilogram) of acutely hazardous waste								
<input type="checkbox"/> Industrial Conditionally Exempt Small Quantity Generator (CESQG)	♦ 220 pounds (100 kilograms) or less of hazardous waste and ♦ less than 2.2 pounds (1 kilogram) of acutely hazardous waste and ♦ 220 pounds (100 kilograms) or more of industrial Class 1 waste								
<input type="checkbox"/> Universal Waste Only	♦ All hazardous waste generated is classified as Universal Waste and no reportable Class 1 waste is generated at the site.								

IHW _____ TCEQ Use Only _____ CO

Section D. Receiver Information

If your facility does not fit the definition of a "Receiver" skip to Section E

1. Facility Category (check one): ☐ Commercial ☐ Captive ☐ Captured

2. Class of Waste Received for treatment, storage or disposal (check all that apply):
☐ Hazardous ☐ Class 1 ☐ Class 2 ☐ Class 3

3. If you receive waste from off-site and recycle it, see TCEQ Form 0524 "Notification Form for Receiving and Recycling Hazardous or Industrial Waste".

Section E. Transporter Information

If your facility does not fit the definition of a "Transporter" skip to Section F

*To Transport hazardous waste you must have an EPA identification number. See EPA RCRA Subtitle C Site Identification Form (EPA Form 8700-12).

1. Carrier Classification (answer "yes" or "no" to each question):
a. Do you transport for hire? ☒ Yes ☐ No
b. Do you transport your own waste? ☐ Yes ☒ No
c. Is this site a transfer facility? ☐ Yes ☒ No

2. Types of waste transported (check all that apply):
☒ Hazardous* ☒ Class 1 ☒ Class 2 ☐ Class 3

Section F. Certification of Company Information

I certify that the information submitted herein is complete and accurate to the best of my knowledge

Todd Conner
Printed Preparer's Name

(281) 459-9992
Telephone Number

T. Conner
Preparer's Signature

5/18/06
Date

Mail all completed registration forms

(i.e., Notification for Hazardous or Industrial Waste Management, TCEQ 00002; TCEQ Core Data Form, TCEQ 10400; EPA RCRA Subtitle C Site Identification Form, EPA Form 8700-12)

**Texas Commission on Environmental Quality
Registration, Review, and Reporting Division
Registration and Reporting Section, MC 129
PO Box 13087
Austin, TX 78711-3087**

If you have questions on how to fill out this form or about the Industrial and Hazardous Waste Program, please contact us at 512/239-6413. Individuals are entitled to request and review their personal information that the agency gathers on its forms. They may also have any errors in their information corrected. To review such information, contact us at 512/239-3282.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

NOV 18 2014

CERTIFIED MAIL – RETURN RECEIPT REQUESTED: 7001 0360 0001 1267 0297

Mr. Brien T. Conner
President
C4 Environmental Services LLC
9000 Ste A Liberty Road
Houston, Texas 77028

Re: No Further Action Concerning the Request for Information Pursuant to Section 3007 of RCRA regarding facility operations at the facility located in Houston, Texas; EPA ID No. TXR000070243

Dear Mr. Conner:

I am writing to inform you that the Compliance Assurance and Enforcement Division of Region 6 US Environmental Protection Agency has reviewed the information you provided in the response to the matter of a RCRA 3007 Information Request dated April 23, 2014. Based on the information provided, we determined no further action is required at this time.

If you have any questions regarding this letter or the 3007 file review, please contact Paul James of my enforcement staff at the above EPA address, or telephone (214) 665-6445.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Mark Potts".

Mark Potts, Chief
Hazardous Waste Enforcement Branch

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

OFFICIAL USE

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark
Here


Sent To
Brien T. Conner President C4 Environmental Services LLC
Street, Apt. No.,
or PO Box No. 9000 Ste A Liberty Road
City, State, ZIP+4 Houston, TX 77028

PS Form 3800, January 2001

See Reverse for Instructions

7001 0360 0000 0960 1000 1267 0297

9/17/10 AP

<p>SEND COMPLETED FORM TO: The Appropriate State or Regional Office.</p>	<p align="center">United States Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION FORM</p>		
<p>1. Reason for Submittal</p> <p>MARK ALL BOX(ES) THAT APPLY</p>	<p>Reason for Submittal:</p> <p><input type="checkbox"/> To provide an Initial Notification (first time submitting site identification information / to obtain an EPA ID number for this location)</p> <p><input checked="" type="checkbox"/> To provide a Subsequent Notification (to update site identification information for this location)</p> <p><input type="checkbox"/> As a component of a First RCRA Hazardous Waste Part A Permit Application</p> <p><input type="checkbox"/> As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment # _____)</p> <p><input type="checkbox"/> As a component of the Hazardous Waste Report (If marked, see sub-bullet below)</p> <p><input type="checkbox"/> Site was a TSD facility and/or generator of $\geq 1,000$ kg of hazardous waste, > 1 kg of acute hazardous waste, or > 100 kg of acute hazardous waste spill cleanup in one or more months of the report year (or State equivalent LQG regulations)</p>		
<p>2. Site EPA ID Number</p>	<p>EPA ID Number <u>T X R 0 0 0 0 7 0 2 4 3</u></p>		
<p>3. Site Name</p>	<p>Name: C4 Environmental Services, LLC <i>Per Todd Conner SB 9/12/2010</i></p>		
<p>4. Site Location Information</p>	<p>Street Address: <u>9000 Liberty Road</u> <i>9000 A Liberty Rd</i></p> <p>City, Town, or Village: <u>Houston</u></p> <p>State: <u>Texas</u> Country: <u>USA</u> County: <u>Harris</u> Zip Code: <u>77028</u> <i>- 5713</i></p>		
<p>5. Site Land Type</p>	<p><input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other</p>		
<p>6. NAICS Code(s) for the Site (at least 5-digit codes)</p>	<p>A. <u>5 4 1 6 2 0</u> C. <u> </u></p> <p>B. <u> </u> <i>5713</i> D. <u> </u></p>		
<p>7. Site Mailing Address</p>	<p>Street or P.O. Box: <u>9000 Liberty Road</u> <i>9000 A Liberty Rd</i></p> <p>City, Town, or Village: <u>Houston</u></p> <p>State: <u>Texas</u> Country: <u>USA</u> Zip Code: <u>77028</u> <i>- 5713</i></p>		
<p>8. Site Contact Person</p>	<p>First Name: <u>Brien</u> MI: <u>T</u> Last: <u>Conner</u></p> <p>Title: <u>President</u> <i>Site</i></p> <p>Street or P.O. Box: <u>9000 Liberty Road</u></p> <p>City, Town or Village: <u>Houston</u></p> <p>State: <u>Texas</u> Country: <u>USA</u> Zip Code: <u>77028</u> <i>- 5713</i></p> <p>Email: <u>tconner@c4env.com</u></p> <p>Phone: <u>713-670-0200</u> Ext.: <u> </u> Fax: <u>713-670-0404</u></p>		
<p>9. Legal Owner and Operator of the Site</p>	<p>A. Name of Site's Legal Owner: <u>C4 Liberty Holdings, LLC</u> Date Became Owner: <u>12/31/2008</u></p> <p>Owner Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other</p> <p>Street or P.O. Box: <u>9000 Liberty Road</u></p> <p>City, Town, or Village: <u>Houston</u> Phone: <u>713-670-0200</u></p> <p>State: <u>Texas</u> Country: <u>USA</u> Zip Code: <u>77028</u> <i>- 5713</i></p> <p>B. Name of Site's Operator: <u>C4 Environmental Services, LLC</u> Date Became Operator: <u>5/18/2009</u></p> <p>Operator Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other</p>		

RECEIVED

to fin 9/10/10
TH 8700-12 MB

10. Type of Regulated Waste Activity (at your site)

Mark "Yes" or "No" for all current activities (as of the date submitting the form); complete any additional boxes as instructed.

A. Hazardous Waste Activities; Complete all parts 1-7.

Y ☐ N ☒

1. Generator of Hazardous Waste

If "Yes", mark only one of the following – a, b, or c.

- ☐ a. LQG: Generates, in any calendar month, 1,000 kg/mo (2,200 lbs./mo.) or more of hazardous waste; or Generates, in any calendar month, or accumulates at any time, more than 1 kg/mo (2.2 lbs./mo) of acute hazardous waste; or Generates, in any calendar month, or accumulates at any time, more than 100 kg/mo (220 lbs./mo) of acute hazardous spill cleanup material.
- ☐ b. SQG: 100 to 1,000 kg/mo (220 – 2,200 lbs./mo) of non-acute hazardous waste.
- ☐ c. CESQG: Less than 100 kg/mo (220 lbs./mo) of non-acute hazardous waste.

If "Yes" above, indicate other generator activities.

Y ☐ N ☒

- d. Short-Term Generator (generate from a short-term or one-time event and not from on-going processes). If "Yes", provide an explanation in the Comments section.

Y ☐ N ☒

- e. United States Importer of Hazardous Waste

Y ☐ N ☒

- f. Mixed Waste (hazardous and radioactive) Generator

Y ☒ N ☐

2. Transporter of Hazardous Waste

If "Yes", mark all that apply.

- ☒ a. Transporter
- ☒ b. Transfer Facility (at your site)

Y ☐ N ☒

3. Treater, Storer, or Disposer of Hazardous Waste

Note: A hazardous waste permit is required for these activities.

Y ☐ N ☒

4. Recycler of Hazardous Waste

Y ☐ N ☒

5. Exempt Boiler and/or Industrial Furnace

If "Yes", mark all that apply.

- ☐ a. Small Quantity On-site Burner Exemption
- ☐ b. Smelting, Melting, and Refining Furnace Exemption

Y ☐ N ☒

6. Underground Injection Control

Y ☐ N ☒

7. Receives Hazardous Waste from Off-site

B. Universal Waste Activities; Complete all parts 1-2.

Y ☒ N ☐

1. Large Quantity Handler of Universal Waste (you accumulate 5,000 kg or more) [refer to your State regulations to determine what is regulated]. Indicate types of universal waste managed at your site. If "Yes", mark all that apply.

- a. Batteries ☒
- b. Pesticides ☒
- c. Mercury containing equipment ☒
- d. Lamps ☒
- e. Other (specify) Paint related mat. ☒
- f. Other (specify) _____ ☐
- g. Other (specify) _____ ☐

Y ☐ N ☒

2. Destination Facility for Universal Waste

Note: A hazardous waste permit may be required for this activity.

C. Used Oil Activities; Complete all parts 1-4.

Y ☒ N ☐

1. Used Oil Transporter

If "Yes", mark all that apply.

- ☒ a. Transporter
- ☒ b. Transfer Facility (at your site)

Y ☐ N ☒

2. Used Oil Processor and/or Re-refiner

If "Yes", mark all that apply.

- ☐ a. Processor
- ☐ b. Re-refiner

Y ☐ N ☒

3. Off-Specification Used Oil Burner

Y ☐ N ☒

4. Used Oil Fuel Marketer

If "Yes", mark all that apply.

- ☐ a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
- ☐ b. Marketer Who First Claims the Used Oil Meets the Specifications

EPA ID Number TXR 000070243

OMB#: 2050-0024; Expires 11/30/2011

D. Eligible Academic Entities with Laboratories—Notification for opting into or withdrawing from managing laboratory hazardous wastes pursuant to 40 CFR Part 262 Subpart K

- ❖ You must check with your State to determine if you are eligible to manage laboratory hazardous wastes pursuant to 40 CFR Part 262 Subpart K

- ☐ 1. Opting into or currently operating under 40 CFR Part 262 Subpart K for the management of hazardous wastes in laboratories
See the item-by-item instructions for definitions of types of eligible academic entities. Mark all that apply:

- ☐ a. College or University
☐ b. Teaching Hospital that is owned by or has a formal written affiliation agreement with a college or university
☐ c. Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university

- ☐ 2. Withdrawing from 40 CFR Part 262 Subpart K for the management of hazardous wastes in laboratories

11. Description of Hazardous Waste

- A. Waste Codes for Federally Regulated Hazardous Wastes.** Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more spaces are needed.

D001	D002	D003	D004	D005	D006	D007
D008	D009	D010	D011	D012	D013	D014
D015	D016	D017	D018	D019	D020...	
		(see attached for additional codes)				

- B. Waste Codes for State-Regulated (i.e., non-Federal) Hazardous Wastes.** Please list the waste codes of the State-Regulated hazardous wastes handled at your site. List them in the order they are presented in the regulations. Use an additional page if more spaces are needed.

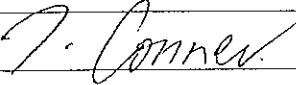
12. Notification of Hazardous Secondary Material (HSM) Activity

Y ☐ N ☒ Are you notifying under 40 CFR 260.42 that you will begin managing, are managing, or will stop managing hazardous secondary material under 40 CFR 261.2(a)(2)(ii), 40 CFR 261.4(a)(23), (24), or (25)?

If "Yes", you must fill out the Addendum to the Site Identification Form: Notification for Managing Hazardous Secondary Material.

13. Comments

14. **Certification.** I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations. For the RCRA Hazardous Waste Part A Permit Application, all owner(s) and operator(s) must sign (see 40 CFR 270.10(b) and 270.11).

Signature of legal owner, operator, or an authorized representative	Name and Official Title (type or print)	Date Signed (mm/dd/yyyy)
	Todd Conner, President	07/20/2010

Attachment for EPA Form 8700-12 Section 11.A

D021	D022	D023	D024	D025	D026	D027	D028	D029	D030	D031	D032
D033	D034	D035	D036	D037	D038	D039	D040	D041	D042	D043	F001
F002	F003	F004	F005	F006	F007	F008	F009	F010	F011	F012	F019
F020	F021	F022	F023	F024	F025	F026	F027	F028	F032	F034	F035
F037	F038	F039	P003	P004	P005	P006	P119	P012	P011	P013	P014
P017	P021	P127	P022	P095	P024	P029	P030	P031	P033	P016	P037
P050	P051	P097	P056	P057	P059	P063	P096	P060	P065	P066	P068
P064	P071	P190	P073	P074	P075	P076	P077	P078	P087	P088	P089
P034	P048	P092	P093	P098	P099	P201	P102	P104	P105	P106	P108
P110	P123	P120	P001	P121	P122	P205	U001	U034	U187	U005	U240
U112	U144	U214	U002	U003	U004	U006	U007	U008	U009	U011	U012
U136	U014	U015	U010	U280	U278	U364	U271	U157	U016	U017	U192
U018	U094	U049	U093	U181	U019	U038	U030	U035	U037	U221	U028
U169	U183	U021	U022	U197	U023	U085	U225	U128	U031	U159	U160
U053	U074	U136	U032	U372	U238	U097	U114	U062	U279	U367	U215
	U033	U156	U211	U038	U042	U044	U046	U047	U048	U050	U051
	U052	U055	U246	U056	U057	U130	U060	U061	U063	U069	U070
	U071	U072	U073	U075	U078	U079	U025	U027	U024	U081	U082
	U084	U086	U088	U089	U090	U092	U095	U098	U099	U101	U102
	U103	U105	U106	U107	U108	U109	U110	U041	U404	U067	U076
	U077	U184	U218	U359	U043	U210	U228	U113	U117	U115	U118
	U119	U120	U122	U123	U124	U125	U147	U213	U126	U127	U131
	U132	U133	U134	U135	U137	U140	U141	U142	U143	U145	U129
	U148	U149	U150	U151	U152	U029	U045	U153	U154	U155	U247
	U226	U158	U068	U080	U138	U161	U162	U164	U167	U168	U165
	U236	U166	U217	U170	U171	U185	U186	U188	U189	U190	U191
	U194	U193	U083	U196	U200	U201	U202	U203	U204	U205	U206
	U207	U208	U209	U219	U220	U223	U328	U353	U222	U408	U227
	U234	U248	U239	U249							